

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

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CULLAN AND CULLAN LLC, On  
behalf of themselves and all others  
similarly situated,

Plaintiff,

v.

M-QUBE, INC., et al.

Defendants.

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**Case No. 8:13-cv-00172**

**AFFIDAVIT OF JEFFREY D. DAHL WITH RESPECT  
TO NOTICE PLAN FOR THE TWO CLASS ACTION SETTLEMENTS**

I, Jeffrey D. Dahl, being duly sworn and deposed, say:

1. I am over 21 years of age and am not a party to this action. This affidavit is based on my personal knowledge, information provided by the staff of Dahl Administration, LLC (“Dahl”), and information provided by Dahl’s media partners. If called as a witness, I could and would testify competently to the facts stated herein.

2. I am Founder and Principal of Dahl, which has been retained as the Notice Provider and Claims Administrator for the above-captioned action. I am a nationally-recognized expert with over 22 years of experience in class action settlement administration. I have provided claims administration services and notice plans for more than 500 class actions involving securities, product liability, fraud, property, employment and discrimination. I have experience in all areas of settlement administration including

notification, claims processing and distribution. I have also served as a Distribution Fund Administrator for the U.S. Securities and Exchange Commission.

3. A true and correct copy of Dahl's firm background is attached hereto as Exhibit 1.

4. Mark Fellows from Dahl's Media Notice team and I designed the Notice Plan for the Settlements in the above-captioned action. I am responsible for directing Dahl's execution of the Notice Plan.

5. This affidavit describes (a) the methodology used to create the proposed Notice Plan; (b) the proposed Notice Plan; (c) the Notice design; (d) the web-based and application-based mobile Notice; (e) web-based Notice targeted using keyword search terms; (f) web-based Notice targeted using social media interest areas; (g) earned media; (h) the toll-free helpline; and (i) the Settlement website.

### **METHODOLOGY**

6. Working with our media partner, FRWD, Mark Fellows and I designed a Notice Plan that utilizes web-based media to reach Settlement Class Members. In formulating the Notice Plan, we took account of the powerful data showing that individuals now spend far more time seeking and consuming information on the Internet than from print sources, and we will employ sophisticated methods of reaching and exposing members of the Settlement Classes to the Notice that are available to marketers in the digital, online sphere.

7. A true and correct copy of the Declaration of John Grudnowski, the founder and CEO of FRWD, is attached hereto as Exhibit 2.

8. The Declaration of John Grudnowski provides detailed information regarding online advertising in general and describes in detail the digital component of the Notice Plan for these Settlements.

9. The proposed Notice Plan uses the methods that have been and are currently used by the nation's largest advertising media departments to target and place billions of dollars in advertising. These methods include the sophisticated targeting capabilities of digital marketing technologies to meet and reach the members of the Settlement Classes at the websites and mobile applications they visit most frequently.

#### **PROPOSED NOTICE PLAN**

10. The objective of the proposed Notice Plan is to provide notice of the Proposed Settlements to members of the Proposed Settlement Classes (referenced collectively herein as "Settlement Class Members" or "Class") that satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure.

11. I understand that the members of the Mobile Messenger Settlement Class generally are persons who are current and former Wireless Subscribers Nationwide who, (a) between January 1, 2010 and the date of Notice in this case, incurred any charge, whether paid or not, relating to certain billing descriptors, shortcodes, and program names; or (b) between January 1, 2010 and the date of Notice in this case, received any message from a Premium Short Code registered at the CTIA to certain types of non-profit or political organizations; and that members of the CF Enterprises Settlement Class generally are current and former Wireless Subscribers Nationwide who, (c) between January 31, 2011 and the Notice Date, received a text message from any Message Claim

Shortcode or relating to a Message Claim Program. For ease of reference, the Mobile Messenger Settlement Class and CF Enterprises Settlement Class are referenced collectively as the “Settlement Class.”

12. We have designed this Notice Plan to target a selection of mobile websites, mobile applications, relevant search interest keywords, and specific social media interest areas that match the characteristics of this nationwide Settlement Class of wireless phone subscribers.

13. In creating this Notice Plan we first took into consideration that the Settlement Class are persons who have received messaging via their mobile device. To notify this audience it is important to include notice delivery to mobile devices in the Plan. These notice impressions will be delivered using digital banner notice advertisements (“Banner Notices”) delivered via mobile web browsers such as Chrome and Safari as well as downloaded mobile applications, the largest percentage of the latter via Apple iOS and Google Android.

14. Within this Notice Plan we focus on the smartphone market in the United States. This is inclusive of demographic, age, gender, location, and language. The Settlement Class in these Settlements is broad. We are reaching mobile phone users aged 18 and older in the United States across those demographic considerations. Since 2012, more than 240 million unique individuals have a mobile phone in the United States. This represents greater than 80% of the total adult population, including 90% of American adults. In our notification planning, as the target is effectively 90% of US Adults,

layering on additional data and targeting parameters would add no material benefit to reaching the Settlement Class.

15. In addition, according to Pew Research, 72% of American adults utilize social media, with more than 50% using social media every day. By efficiently leveraging mobile targeting and social media, this Notice Plan is an effective method of reaching this broad audience of mobile phone subscribers.

16. Since the names and addresses for most Settlement Class Members are not readily available, providing notice directly to every Settlement Class Member by mail is not a reasonable or feasible option.

17. We have designed a Notice Plan that includes six elements:

- a. Mobile Notice using paid Banner Notices on targeted websites and applications;
- b. Additional web-based Notice using “keyword” searches displaying Banner Notices;
- c. Social media Banner Notices targeting relevant interest areas;
- d. National earned media through the issuing of a press release distributed nationwide through PR Newswire;
- e. A dedicated, informational website through which Settlement Class Members can obtain more detailed information about the Settlement and access case documents; and

f. A toll-free telephone helpline by which Settlement Class Members can obtain additional information about the Settlement and request a copy of the Notice.

18. The Notice Plan has been designed to obtain over 160 million digital impressions targeted to persons who own wireless phones in order to achieve sufficient scale and impression frequency to target Settlement Class Members. Coverage and exposure will be further increased by the earned media campaign, the website, and the toll-free helpline.

19. At the conclusion of the Notice Plan, Dahl will provide a final report verifying implementation of the Notice Plan and provide the final Settlement Class notification results.

### **NOTICE DESIGN**

20. Rule 23(c)(2) of the Federal Rules of Civil Procedure requires that class action notices be written in “plain, easily understood language.” The proposed Notices have been designed to be noticed, read, and understood by potential Settlement Class Members. The Long Form Notice, which will be available to those who call the toll-free helpline or visit the website, contain substantial, easy-to-understand descriptions containing all key information about the Settlements and Settlement Class Members’ rights and options. A copy of the proposed Long Form Notice and Short Form Notice are attached to the Settlement Agreements. Example Banner Notices that will be placed in executing the mobile notice component of this Notice Plan are attached as Exhibit 4.

### **MOBILE NOTICE**

21. To reach as many of the estimated Settlement Class Members as possible, Dahl has designed a web-based notice campaign utilizing mobile Banner Notices with a link to the Settlement website. Banner Notices will appear on a subset of mobile websites of the comScore 2000. The comScore 2000 represents the top 2,000 most trafficked websites, and is sufficiently broad to include websites that are viewed by at least 95% of the Settlement Class.

22. Dahl/FRWD will also be leveraging the top trafficked mobile mobile applications, which include Google, Apple, the NYTimes, CNN, as well as top social media properties on mobile, such as Facebook, Twitter, and others. A full list of mobile domains and applications that will be used in this Notice Plan is provided in Exhibit 4.

23. A significant advantage of using mobile Banner Notices delivered over the Internet is the ability to track in detail where the Banner Notices are displayed on the mobile websites and applications and the behavior of the users who click on the Banner Notices to visit the Settlement Website. Through use of Internet targeting we can control unique individuals reached by the unique DoubleClick ID placed on individual web browsers. Through this we can monitor total unique reach of individuals reached. Beyond unique reach measured by browser ID, we can measure unique mobile phone IDs reached via targeting programs. In addition, we will leverage technology to specifically measure the “viewability” of the ads being shown on each page. This is no different in principle than when placing Print, Radio or TV ads. However, with Internet Banner Notices we can optimize ad placements to those websites and ad inventory which are



proving to be most effective in matching a unique user with a viewable ad. In fact, digital advertising is the only method that enables substantive tracking, real-time optimization, and the ability to prove the unique reach to an individual browser or phone ID.

24. In Dahl's experience, digital Banner Notice advertising delivered over the Internet has consistently proven to be the best driver of settlement website visits, digital document downloads, and online claim filing when compared to other methods of publication notice.

25. The Grudnowski Declaration attached as Exhibit 2 provides more detailed information about the technologies and methods that we will use to implement and track this component of the Notice Plan. Example Banner Notices that will be placed in executing the mobile notice component of this Notice Plan are attached as Exhibit 4.

#### **USING KEYWORD SEARCH TERMS**

26. The proposed Notice Plan will include Banner Notices targeted to display in response to the entry of specific keywords related to Defendants' services and wireless phone usage in general on major search engine websites.

#### **USING SOCIAL MEDIA INTEREST AREAS**

27. The proposed Plan will include Banner Notices that will be displayed to users of the Facebook social media network. These Banner Notices will appear on Facebook web pages displayed to Facebook users whose profile fit the definition of the Class. Targeted interest areas will include Mobile Phone Interest and Mobile Network Interest as well Adults Aged 18-45. In previous notification plans, this method of

targeting has led to significant increases in overall claims. The number of times each potential Settlement Class Member may view the Facebook Banner Notices will not be limited or “frequency capped” in any way.

### **EARNED MEDIA**

28. The proposed Notice Plan will also include earned media to supplement the paid media portion of the Plan and will be targeted to a national audience. “Earned media” refers to promotional efforts outside of direct, paid media placement. The earned media efforts will provide additional notice of the Settlements to potential Settlement Class Members, though the effect is not measurable as it is with the impressions accumulated with the paid media portion of the Notice campaign.

29. Concurrent with the launch of the online Notices, Dahl will release a national press release via PR Newswire. The press release will be distributed by PR Newswire to 5,815 newspapers, television stations, radio stations and magazines. In addition, PR Newswire will send the press release to approximately 5,400 websites and online databases, including all major search engines.

### **TOLL-FREE HELPLINE**

30. Prior to the launch of the web-based media campaigns, Dahl will also establish a toll-free Settlement helpline to assist potential Settlement Class Members and any other persons seeking information about the Settlements. The helpline will be fully automated and will operate 24 hours per day, seven days per week. Callers will also have the option to leave a message in order to speak with the Claims Administrator.

31. The toll-free helpline will include a voice response system that allows callers to listen to general information about the Settlement, listen to responses to frequently asked questions (“FAQs”), or request a Long-Form Notice.

32. Dahl will work with Counsel to prepare responses to the FAQs to provide accurate answers to anticipated questions about the Settlement.

### **SETTLEMENT WEBSITE**

33. Prior to the launch of the web-based media campaigns, Dahl will coordinate and integrate into the Notice Plan a Settlement website.

34. Dahl will work with Counsel to develop the content for the Settlement website. The website will provide Settlement Class Members with general information about the Settlements, answers to frequently asked questions, a means to submit an electronic Claim Form or download a Claim Form, important date and deadline information, a summary of Settlement benefits, a means by which to review and print copies of certain Settlement documents (including the Long Form Notice), and a link to contact the Claims Administrator via email.

### **CONCLUSION**

35. It is my opinion that the proposed Notice Plan, by producing more than 160 million digital impressions, including impressions delivered on mobile devices, that are targeted using methods universally employed in the advertising industry at persons that match characteristics of the Settlement Class, provides sufficient Notice to the Settlement Class satisfying constitutional due process requirements.

36. It is also my opinion that the proposed Notice Plan is fully compliant with Rule 23 of the Federal Rules of Civil Procedure and meets the notice guidelines established by the Federal Judicial Center's Manual for Complex Litigation, 4<sup>th</sup> Edition (2004), as well the Federal Judicial Center's Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (2010), and is consistent with notice programs approved previously by both State and Federal Courts.

**EXHIBITS**

37. Attached hereto are true and correct copies of the following exhibits:

Exhibit 1: Background information on Dahl Administration

Exhibit 2: Declaration of John Grudnowski in Support of the Settlement

Notice Plan

Exhibit 3: Example Banner Notices

Exhibit 4: List of website domains and mobile applications on which banner  
ads will be placed

I declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge. Executed this 21<sup>st</sup> day of December, 2015 in Minneapolis, Minnesota.

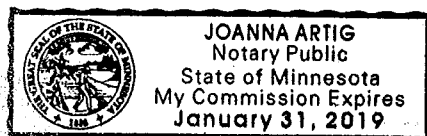
Jeffrey D. Dahl

Jeffrey D. Dahl  
Principal  
Dahl Administration, LLC

Sworn to and Subscribed before me  
this 21<sup>st</sup> day of December, 2015.

Joanna Artig

Notary Public



## **Exhibit 1**



**Firm Information  
and Selected References**

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## OUR FIRM

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## OUR FIRM

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### OUR HISTORY

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After more than 15 years of experience managing hundreds of settlements and distributing billions in settlement benefits, Jeff and Kristin returned to their roots as hands-on administrators providing innovative and cost-effective solutions. They created Dahl Administration to provide responsible, accountable, and transparent settlement administration services, and to become a trusted resource for class action counsel nationwide.

Dahl Administration has a history that stretches back to the beginnings of the class action settlement administration industry. Jeff Dahl was a founding partner of Rust Consulting and Kristin Dahl was Rust's second employee. During their time with Rust, the firm managed over 2,000 class action settlements.

Jeff and Kristin built Dahl Administration from the ground-up to provide the kind of service and expertise that complex claims administration projects demand, something that is too often lost within the corporate overhead and "turn-key solutions" that come with very large administrators. To do this, Dahl Administration combines advanced claims processing technology with expert project teams that are 100% focused on meeting client needs. This project team approach eliminates departmental "silos" that lack overall understanding of a client's project needs and lose the ability to communicate effectively when issues arise.

To focus on client needs, Jeff and Kristin created an organization that produces truly custom solutions, where project managers and principals actually answer their phones and emails, employees are empowered to resolve issues, and team members proactively communicate with clients to eliminate unwelcome surprises. The same people that consult and generate project proposals also attend weekly project update meetings and actively manage project work. This continuity ensures that project execution and costs meet or exceed the standards set in the proposal.

Dahl Administration is a full-service provider, with a staff of professionals experienced in class action administration, direct and media notice, process development, document and script development, data and image capture, claims processing, quality control review, accounting, project management, software development, and distribution. We also have sophisticated technology resources in place to implement solutions of any size and any level of complexity.

We are committed to managing successful projects that are completed on time, on budget, and with the highest level of quality in the industry.



## OUR FIRM

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### OUR PHILOSOPHY

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#### Dahl's 6 Key Principles:

##### **Accountable**

We are experts at what we do. When you hire us the work is done correctly and we stand behind it. No exceptions.

- **Immediate Resolution**

When issues arise, we fix them. Dahl principals are actively involved in day-to-day client support and project management.

- **Project Team Responsibility**

Our project managers are empowered to make decisions and resolve issues directly, guided by Dahl principals who actively monitor every project.

- **True Real-time Quality Assurance**

We perform quality reviews continuously within the project processing cycle, not through a generic, detached auditing function.

##### **Responsive**

Nothing is more frustrating than having issues arise and no one will answer the phone or respond to an email. Our managers and principals are required to answer their phone and check their email 24/7. We want you to call our mobile numbers in an emergency, that's why we give them to you. You can always call our president and he will be happy to assist you. We don't just say this, we do it.

- **Online, All the Time**

We answer the telephone. We know your time is money, so when you have an issue, you can call or email your project manager, your project principal, or the company president to get it resolved promptly – day or night.

- **Empowered, Knowledgeable Staff**

We don't forward you to different departments or park your issue with a ticketing system. Your assigned project manager is knowledgeable and empowered to provide solutions on your project. If they don't know the answer, they will get it – promptly and willingly.

- **Client Relationships Drive Our Business**

We are about you. We strive to develop a long-term, successful partnership with you.



## OUR FIRM

### Technology-Driven

Sometimes it takes a custom technology solution to meet a unique settlement administration challenge. We have a dedicated information technology staff and a full menu of technology services to offer our clients. Whether you need a secure web-based claims submission portal, a custom IVR phone solution, innovative web-based class notice, or anything else, we will work with you to build the solution that works for your settlement and your budget.

- **Advanced Capabilities**

We offer advanced print and mail solutions, custom IVR phone technology, online filing, "Quick Site" claim image access for clients, high-speed scanning, and flexible fund distribution alternatives.

- **Data Security**

We provide secure physical facilities, proven technical infrastructure, and information-handling procedures to protect sensitive data.

- **Custom Technical Solutions**

We custom configure solutions for each project, so you get innovative claims processing workflow that fits your needs.

- **Capacity and Sophistication**

We have dedicated information technology staff and a high-capacity technology environment to support any size or type of case.

### Affordable

In today's economic times, price is always a factor. At Dahl, we have eliminated a lot of unnecessary overhead by focusing our staffing on project-based needs. Dahl employees work on projects. This allows us to keep rates low and stay focused on our clients.

- **Best Service at the Best Price**

We provide innovative and efficient services designed to administer your project correctly and cost-effectively.

- **Nimble and Right Sized**

We have project-based teams focused on your case solutions. All of our employees do project work, eliminating non-essential corporate overhead.



## OUR FIRM

### Custom Solutions

We don't provide 'turn-key' processing solutions. Over the years, we have found that our clients expect more from us. We customize our solutions to meet our clients' varied expectations and do it at a 'turn-key' price.

- **True Customization**

We deploy our expertise and tools to fit your project's needs.

- **Your Project Your Way**

We don't force your project into our process, we adjust our process to meet your requirements.

- **Adjustable and Adaptable**

We are nimble and proactive, enabling us to make real-time processing changes to meet your deadlines and requirements.

### No Surprises

You should not have to deal with missed deadlines or surprise invoices that far exceed proposed costs. We anticipate issues and stay on top of your settlement schedule for you. Weekly processing updates and monthly budget updates eliminate unpleasant surprises. Clients tell us that their "no surprises" experience with Dahl is what keeps them coming back again and again.

- **Every Project Every Day**

We anticipate issues. Our "every project, every day" philosophy means our project team is on top of your schedule and proactively addressing any issues.

- **Consistent Reporting**

We deliver weekly processing updates and monthly budget updates on every project.

- **Active Communication**

Our principals and project managers proactively track changes in project dynamics and communicate any issues to you



## OUR FIRM

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### OUR SERVICES

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Dahl provides project management and settlement distribution services to attorneys, distribution agents, special masters, governmental agencies, and the courts.

Our services include:

- Settlement Administration Planning and Design
- Management Team
- Project Management
- Cost Analysis
- Pre-Settlement Consultation
- Claimant Notification
- Innovative Notice Planning and Execution
- Claim Document Development and Layout
- Website and Call Center Services
- Claimant Communication
- CAFA Notice
- Document Imaging and Data Capture
- Claim Evaluation and Processing
- Reporting
- Quality Assurance Review
- Problem Identification and Resolution
- Distribution Management



## OUR FIRM

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### INNOVATIVE NOTICE PLANNING AND EXECUTION

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Change in the media landscape is accelerating and it is imperative that class action notification planning and execution reflect these changes. More people are now consuming news media via Internet sources than are reading even the most recognized print publications. Given this sea change, it no longer makes sense for class action notification plans to reflexively purchase print advertisements in the same leading national or regional print publications without considering the reality of where class members are directing the bulk of their attention. Print publication still has its place, often as a supplementary notice tactic, but that place will be less and less as the primary method of reaching unidentified class members.

With over 22 years of experience in class action notice and claims administration, Jeff Dahl recognized that class action notice plans were insufficiently utilizing the newly-available tools from the Internet marketing and communications industry. To fill this gap, Dahl Administration reached out to a leading digital marketing agency, FRWD, to develop best practices in applying digital media strategies and execution programs to the class action notification arena. The premise is simple: reach class members using the same digital media tools that FRWD's clients—brands such as 3M, Coca-Cola, Best Buy, Procter & Gamble, General Mills and more—use to reach their own customers. In planning to provide “the best notice that is practicable under the circumstances” it is no longer acceptable to ignore the digital sphere where class members are now spending the bulk of their media consumption time and attention.

Dahl has deep experience in class action notification, and Dahl handles individual notice planning and execution more efficiently than anyone in the industry. Whether the case involves direct postal mail or email, Dahl will handle the data cleansing, returned mail and tracing, and other standard or custom procedures such that as many of the reasonably identifiable class members get notice of the litigation as possible.

When it comes to publication notice, the Dahl-FRWD approach diverges from the rest of the class action notification industry.

- We reach class members using the same strategies and tactics that leading advertisers would use to reach the same target audience as customers.
- Where feasible, we meet with marketing staff from the defendant(s) along with plaintiff and defense counsel to determine customer demographic and psychographic profiles.
- The logic is unassailable: where defendants have developed highly sophisticated knowledge about their customers and prospective customers, the class action notice process should seek out this knowledge and put it to use.



## OUR FIRM

- Too often, this approach is overlooked in favor of the same print publication placements and, sometimes, a scattershot web banner ad campaign directed only by the broadest of demographic profiles.

### Targeting

First, we validate targeting parameters and align media buying with all parties. This process includes hand selecting specific website domains, print publications, geographic targeting, audience interest targeting, and more. By bringing the parties into the process, we are able to align more specifically on targeting needs and expectations in notification.

### Technology

Second, we begin technology systems alignment. In delivering a modern notification plan, multiple technical systems must be aligned. This is done to ensure accuracy in delivery of media as well as verifying that delivery meets expectations. In typical notification planning Dahl-FRWD will leverage data collection, ad serving, and verification technologies. In parallel with finalizing media, Dahl-FRWD will install and set up all needed technology. In a recent matter where U.S. nationwide notification was required, we structured 50 unique campaigns to ensure proper distribution and verification of notice in each U.S. state. This often overlooked step is vital to ensuring proper notification as Dahl-FRWD can verify reach by state, country, and region. Any notification plan overlooking this step is simply not leveraging available technology to the best practices level.

### Execution

The Dahl-FRWD approach involves much more than the mere use of “industry-standard methodology” for the placement of web banner ads. In fact, class action notice “experts” often settle for buying blocks of surplus banner ads from wholesalers. Our goal is to use the same targeting and execution methodology that leading brands use to reach their own customers when we seek to reach those same persons in their capacity as class members. Our methodology of media planning and buying leads to greater accuracy, quality and control of media. The cost advantage is typically 20% to 30%, meaning we can typically reach 20% to 30% greater population base at the same media cost as traditional media notice plans.

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## OUR PEOPLE

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**CHRISTOPHER LONGLEY**

President

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Chris is President of Dahl Administration. A former practicing attorney for the Minneapolis law firm of Hessian, McKasy & Soderberg, Chris has spent the last 25 years in the business sector.

Prior to joining Dahl, Chris was Managing Director and Vice President at SRS|Acquiom, a leading professional shareholder representative firm located in Denver and San Francisco. Prior to SRS Chris spent many years within Thomson Reuters running a global team focused on Mergers and Acquisitions.

A successful entrepreneur, Chris was part of the founding team of 10 start-up companies, and spent 11 years as Vice President of Business Development at a mid-size private equity firm in Minneapolis, where he ran sales and marketing operations for various portfolio companies from Florida to Ankara, Turkey.

Chris graduated from William Mitchell College of Law, and the University of St. Thomas. He is admitted to practice in Minnesota, The 8<sup>th</sup> circuit and the United States Supreme Court.

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**JEFF DAHL**

Founder and Principal

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Jeff co-founded Dahl Administration, LLC in early 2008 and was previously a founding partner and co-owner at Rust Consulting, Inc., one of the two largest class action claims administration firms in the country.

Jeff is a noted expert in all areas of settlement administration including notification, claims processing and distribution. He is known for providing innovative solutions to resolve complex project issues.

Jeff was the court-appointed Neutral Expert tasked with providing final claim determinations for a \$176 million settlement in Rhode Island, involving over 300 victims of a 2003 nightclub fire.

He served as the distribution agent for the U.S. Securities and Exchange Commission's \$350 million settlement with Fannie Mae.

During Jeff's 19-year career with Dahl and Rust Consulting, his firms provided claims administration services for over 2,000 class action and regulated settlements including the \$1.1 billion Microsoft California settlement; the \$950 million PB Pipe settlement; the \$850 million Masonite siding and roofing settlement; and they distributed over \$2 billion from U.S. Securities & Exchange Commission Fair Funds.

Jeff graduated from Concordia College-Moorhead with a Bachelor of Arts degree in Business Administration and is a Certified Public Accountant.

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**JOHN GRUDNOWSKI**

Media Expert

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In May 2009, John founded FRWD. He brings 18 plus years of PR and digital marketing services experience that he gained over the course of his career at Accenture, General Mills, Carmichael Lynch and Vail Resorts. John has developed digital strategies, provided expert training, counseled and advised marketing executives, led internal client innovation teams and led execution teams for a variety of Fortune 1,000 clients including: American Express, Discovery, 3M, General Mills, Deluxe, Target, Best Buy, Sony Pictures, Dairy Queen, Starz Entertainment and Ameriprise.

Prior to founding FRWD, John founded and led the modern media practice at space150, a Twin-Cities based ad agency, as well as led agency business development supporting revenue growth from under \$1MM to over \$12MM in four years. John has also co-founded the Minneapolis-based i612 media organization, and has served on multiple digital-based start-up boards of directors.

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**KRISTIN DAHL**

Principal

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Kristin co-founded Dahl Administration, LLC and leads the project management group.

She has worked on three U.S. Securities and Exchange Commission settlements including the \$432 million Global Research Analyst Settlement, the \$100 million HealthSouth Securities settlement, and the \$26 million Banc of America Securities settlement on behalf of Distribution Fund Administrator Francis E. McGovern.

Kristin has eighteen years of project management experience solely in the field of class action claims administration. In her career at both Dahl and Rust Consulting, she was the active project manager on over 150 settlements, including the groundbreaking Denny's race discrimination settlement during which over 1 million phone calls were answered and over 150,000 claims were processed.

Kristin holds a Bachelor of Science degree from the University of Wisconsin-River Falls.

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**MARY WISEMAN**

National Director of Business Development

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Mary is the National Director of Business Development at Dahl, and is responsible for providing expert consulting to aid clients in structuring the notice and claims administration processes. Prior to joining Dahl, Mary was a Senior Account Executive at CBS Radio, Minneapolis where she managed top tier clients for digital and traditional advertising campaigns, including several Fortune 500 companies.

Mary's expertise includes on-air, on-site and online campaigns, with a particular interest in digital advertising. She was named Top New Business Account Executive of the Year while at CBS.

Mary received her Bachelor of Science from the University of Wisconsin-Stout and also attended the American University of London.

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**JEFF HOUDEK**

Principal

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Jeff Houdek is a Principal at Dahl and serves as Dahl's Director of Operations. Among his duties is the management of the tax reporting function for Dahl's Qualified Settlement Funds. A former Big 4 Auditor, he's built his career helping organizations develop effective and scalable accounting and operational systems to enable organizational growth while serving the needs of their customers.

Having worked in a number of heavily regulated industries, where both privacy and cost-effectiveness are paramount, he has helped with the design and development of several technology platforms and reporting applications.

Jeff is a graduate of St. John's University in Collegeville, Minnesota with a Bachelor of Arts degree in Accounting. A Certified Fraud Examiner, Jeff has also previously held CPA, Securities (FINRA) and Insurance licenses.

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**NANCY BAKER**

Principal

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Nancy is a Project Manager with over nine years of experience in securities and class action claims management. Prior to joining Dahl, Nancy was a project manager for Rust Consulting specializing in securities cases. Nancy manages a variety of settlements for Dahl including property, insurance and consumer cases. She also drafts notice documents, call scripts and other claimant communications for the firm's projects, handles our published notice campaigns, and coordinates special projects for clients. Nancy graduated with honors from Augsburg College with a Bachelor of Arts degree.

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**KELLY KRATZ**

Principal

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Kelly is a Senior Project Manager at Dahl with experience in the mortgage and financial services industries and more than eight years of Big 4 Public Accounting experience, including six years of consulting and project management, and two years of operations and resource management. Prior to joining Dahl, Kelly worked as a tax consultant at Deloitte in the National Federal Tax Services Group managing numerous complex high-profile client engagements for several Fortune 100 companies, providing related project IRS audit defense, and preparing tax memorandums.

Kelly holds her Bachelor of Arts degree with a concentration in Financial Management from the University of St. Thomas.

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**MARK FELLOWS**

Principal

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Mark is an attorney whose work is focused on notice planning and project initialization for large or complex matters. He has particular expertise in drafting plain language notice and related documentation to comply with applicable legal standards. He also is experienced in working with counsel to create hybrid notice strategies using electronic media to meet due process standards in challenging situations.

He has more than ten years of experience serving as Legal Counsel and Manager of Legal Research and Education for a large claims adjudication and processing organization. Mark previously worked as a consultant in the data analytics and business intelligence industry. Mark earned his law degree from William Mitchell College of Law and his B.S. from Lewis and Clark College.

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**DAN LEGIERSKI**

Principal

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Dan Legierski is a Principal at Dahl who works closely with other Principals, Project Managers, and the Operations Team to ensure that our clients' needs are met. His professional experience includes over twenty years of effectively leveraging technology to better process legal, regulatory, and consumer claims.

Dan has spent time directing Finance/Accounting, Technology, and Operations Departments so he truly understands all aspects of claims processing and how the various functions work together to ensure quality and efficiency. During his tenure at Dahl, he has led the design and development of two major technology platforms that manage the administration of class action cases, promoting quality, accuracy, and cost-effectiveness.

Dan graduated from the graduate Software Systems Program at the University of St. Thomas, and from St. Cloud State University with a Bachelor of Science degree in both Finance and Economics.

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**BRYN BRIDLEY**

Project Initialization Manager

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Serving as a Project Manager for more than five years, Bryn recently transitioned to the role of Project Initialization Manager. Bryn was a project manager for Rust Consulting prior to joining Dahl and has over nine years of experience in the claims administration industry. Bryn is responsible for the setup of each new Dahl project. After a thorough review of each project's case documents, she establishes a project timeline and works directly with Plaintiff and Defense Counsel to finalize notice documents, drafts telephone and website contents, cleanses data files for mailing, and transitions the project to the Dahl claims management team after notice is mailed.

Bryn graduated with honors from the University of Minnesota-Duluth with a Bachelor of Arts degree.

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**SEAN COMBS**

Project Manager

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Sean is a Project Manager with over eleven years of experience in consumer class action claims management. Prior to joining Dahl, Sean was a Project Coordinator for Rust Consulting, specializing in high volume claims processing and quality assurance. Sean also has several years of experience in providing CAFA notice mailings.

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**CARRIE O'CONNELL**

Project Manager

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Carrie O'Connell joined the Dahl team after working for seven years as a Supervisor in a high-volume legal claim processing organization. Carrie has eight years of experience in legal case management and quality control, which enables her to oversee a variety of settlements for Dahl and to lead our quality assurance team. Carrie earned a Bachelor of Science degree in History from Iowa State University and she received her Paralegal Certificate in 2004.

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**ANN LINTON**

Project Manager

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Ann joined Dahl after working for five years in the distribution business and was involved in chamber of commerce and a neighborhood business group. Previous to that she spent seven years working with juvenile delinquents at a day treatment program.

Ann earned a Masters in Social Work from Augsburg College and a Bachelors of Social Work from University of St. Thomas.

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**JOHN SNYDER**

Director of Information Technology

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John is the architect of Dahl's online claims portal, which allows parties to view and process cases over the internet using paperless workflow capabilities. He has over six years of information technology experience in legal claims processing and nearly 15 years of experience with information technology in general.

John possesses an MBA from the University of Minnesota Carlson School of Business and a law degree from the University of Wisconsin.

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**GENNADIY KATSNELSON**

Web Interface/Custom Development

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Gennadiy is a Software Developer and focuses primarily on web interface and custom software development. He has more than 20 years of top-level website development, design and architecture experience. His prior experience includes project management, website architecture, website design and hands-on development in which he successfully delivered large-scale systems to the market in a number of industries, including legal. Gennadiy has knowledge and practical expertise in a wide range of software platforms and technologies. Gennadiy obtained a Masters Degree in Mathematics and Computer Science from Belarusian State University, Minsk, Belarus.

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## OUR REFERENCES

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## OUR REFERENCES

### DEFENSE COUNSEL

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<b>JOHN F. WARD, JR.</b> Partner, Jenner & Block LLP	<b>MICHAEL T. BRODY</b> Partner, Jenner & Block LLP	<b>NEIL M. BAROFSKY</b> Partner, Jenner & Block LLP
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John Ward and Michael Brody are Defense counsel for the Hertz/ATS/PlatePass settlement (Ward) and the Hertz Equipment Rental Corporation LDW settlement (Brody). Neil Barofsky is Defense counsel representing CashCall in settlements between individual states and a consumer lender and related entities.

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#### **BRIAN R. ENGLAND**

Special Counsel, Sullivan & Cromwell LLP

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<b>MARCI A. EISENSTEIN</b> Partner, Schiff Hardin LLP	<b>PAULA J. MORENCY</b> Partner, Schiff Hardin LLP
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Marci Eisenstein is Defense counsel in the Twin City Fire Insurance/Hartford Insurance settlement. Paula Morency is Defense counsel in the Suave 30-Day Smoothing Kit settlement.

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## OUR REFERENCES

### DEFENSE COUNSEL, CONTINUED

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**BRYAN O. BALOGH**

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Defense counsel in the Janoka v. Veolia Environmental Services settlement.

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**ELIZABETH B. McREE**

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## OUR REFERENCES

### PLAINTIFF COUNSEL

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**JOE KRONAWITTER**

Partner, Horn Aylward & Bandy, LLC

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**RALPH K. PHALEN**

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**MITCHELL L. BURGESS**

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Class co-counsel in numerous settlements administered by Dahl Administration.

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**MARK S. MANDELL**

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## OUR REFERENCES

### PLAINTIFF COUNSEL, CONTINUED

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Class Counsel in the Appel v. Liberty American Insurance Company settlement.

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**CHRISTOPHER S. POLASZEK**

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**MICHAEL COREN**

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## **SELECTED CASES**

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## OUR CASES

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### **STATION NIGHTCLUB FIRE SETTLEMENT - \$176 MILLION**

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Dahl staff provided onsite claim evaluation services at 11 law firms in Providence, Rhode Island to determine claim validity and final claim values for over 300 death and personal injury claims. The review included analysis of authority documents and medical records by a staff of Registered Nurses and senior level project managers. Jeff Dahl is the court-appointed Neutral Expert responsible for final determinations of all claims for this settlement.

Lead Counsel: Mark S. Mandell, Law firm of Mandell, Schwartz & Boisclair, Providence, RI

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### **VEOLIA CLASS SETTLEMENT - 1.2 MILLION COMPLEX DATA RECORDS PROCESSED**

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Dahl was selected to provide Class Notice and Distribution for the Janoka v. Veolia Environmental Services class action. Dahl analyzed and processed over 1.2 million complex data records, mailed notice to over 900,000 potential class members, and processed incoming correspondence and opt outs. Dahl then managed complex claims processing procedures, including detailed analysis of class member invoices and other supporting documentation, and distributed settlement funds to eligible class members.

Plaintiff Counsel: James M. Terrell, McCallum, Methvin & Terrell, P.C., Birmingham, AL

Defense Counsel: Rik S. Tozzi and Brian O. Balogh, Burr Forman LLP

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### **METLIFE CLASS SETTLEMENT - NEARLY 1 MILLION CLASS MEMBER CHECKS DISTRIBUTED**

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Dahl was selected to provide Class Notice, Settlement, Notice, and Distribution for the Bower v. MetLife class action. Dahl mailed notice to over 900,000 potential class members, and processed incoming correspondence and opt outs. Dahl distributed nearly one million checks to eligible class members and handled all requests for re-issued checks. Dahl implemented innovative, cost-effective solutions to manage the distribution process.

Plaintiff Counsel: Steven R. Jaffe, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., Fort Lauderdale, FL; Stephen A. Dunn, Emanuel & Dunn PLLC, Raleigh, NC; and Michael Coren, Cohen, Placitella & Roth, P.C, Philadelphia, PA

Defense Counsel: Ross Bricker and John F. Ward, Jr., Jenner & Block LLP and Robert D. Friedman and Scott H. Moskol, Burns & Levinson LLP



## OUR CASES

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### **HERTZ PLATEPASS SETTLEMENT - 1.6 MILLION NOTICES MAILED**

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Dahl was selected to provide Class Notice, Claims Processing, and Distribution for the Doherty and Simonson v. Hertz, ATS, and PlatePass class action. Dahl mailed notice to over 1.6 million potential class members, administered an efficient online claim filing procedure, and processed incoming correspondence and opt outs. Dahl processed incoming claims and distributed nearly 100,000 checks to eligible class members.

Plaintiff Counsel: Jeffrey Goldenberg, Goldenberg Schneider LPA, Cincinnati, OH and Brian Dershaw, Beckman Weil Shepardson LLC, Cincinnati, OH

Defense Counsel: James Comodeca, Dinsmore & Shohl LLP and James Griffith, Jr., Akin Gump Strauss Hauer & Feld LLP

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### **URBAN ACTIVE FITNESS SETTLEMENT - 600,000 CLASS MEMBERS**

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Dahl was the Settlement Administrator for the Urban Active Fitness class action settlement and was responsible for the distribution of mailed notice to more than 600,000 class members, implementation of a published notice campaign, extensive data processing, online claim filing, and complex claims processing.

Plaintiff Counsel: Thomas N. McCormick, Vorys Sater Seymour and Pease LLP, Columbus, OH

Defense Counsel: V. Brandon McGrath, Bingham Greenebaum Doll PLLC, Cincinnati, OH

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### **RODENBAUGH V. CVS PHARMACY SETTLEMENT - 400,000 CLASS MEMBERS**

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Dahl is the Settlement Administrator for the Rodenbaugh v. CVS Pharmacy class action settlement and was responsible for the distribution of mailed notice to more than 400,000 class members, implementation of a published notice campaign, operation of an informational phone line, processing of claim forms and correspondence submitted by class members, and providing claim review services.

Defense Counsel: Roman Wuller, Thompson Coburn LLP, St. Louis, MO and Edward Hardin Jr., Burr & Forman LLP, Birmingham, AL

Plaintiff Counsel: John Edgar, Edgar Law Firm LLC, Kansas City, MO and Carles McCallum III and R. Brent Irby, McCallum, Hoaglund Cook & Irby LLP, Vestavia Hills, AL



## OUR CASES

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### **COIE v. VERIZON WIRELESS SETTLEMENT- CUSTOM DIRECT NOTICE PROGRAM**

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Dahl distributed the Class Notice and Opt-In Form to a large employment class, including a custom outer envelope including a “QR” matrix barcode which directed Class Members to the mobile-optimized settlement website when scanned by a mobile device. Dahl implemented a comprehensive tracing and re-mail program to maximize the reach of the direct notice program. Dahl managed a live telephone helpline that responded to thousands of phone calls, processed filed claims, and successfully distributed the settlement funds.

Defense Counsel: Elizabeth McRee, Jones Day, Chicago, IL

Plaintiff Counsel: Ilan Chorowsky, Progressive Law Group, Chicago, IL

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### **APPEL v. LIBERTY SETTLEMENT - COMPLEX CLAIM PROCESSING**

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Dahl was the Settlement Administrator for the Appel v. Liberty settlement involving insurance coverage limits for mobile and manufactured homes suffering wind damage in Florida. Dahl implemented a direct notice program, implemented a settlement website and live call center including Spanish-speaking representatives, processed received claims, implemented complex claim processing procedures, and distributed the settlement fund.

Defense Counsel: Amy L. Brown, Squire Sanders, Washington D.C.

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## OUR CASE EXPERIENCE

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## CASE CITES

### CURRENT CASES – DAHL

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#### CONSUMER

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**Aguiar v. Merisant Co.**, No. 2:14-CV-00670 (C.D. Cal.)

**Applewhite v. Capital One Bank**, No. 4:06-CV -69 (N.D. Miss.)

**Avalishvili v. Reussille Law Firm, LLC**, No. 3:12-CV-02772-TJB (D. N.J.)

**Banner v. Law Offices of David J. Stern**, No. 9:11-CV-80914 (S.D. Fla.)

**In re Bisphenol-A (BPA) Polycarbonate Plastic Prods. Liab. Litig.**, No. 4:08-MD-1967 (W.D. Mo.)

**Boewer v. Chris Auffenberd Kirkwood Mitsubishi**, No. 09SL-CC05382 (Mo. Cir. Ct. St. Louis County)

**Bradley v. Sears, Roebuck & Co.**, No. 06-L-0095 (Ill. Cir. Ct. St. Clair County)

**Brandon v. Van Chevrolet-Cadillac, Inc.**, No. 1031-CV14654 (Mo. Cir Ct. Greene County)

**Brannon v. Capital One**, No. 3:07-CV -1016 (M.D. Fla.)

**Brewer v. Missouri Title Loans, Inc.**, No. 0722-CC-00015 (Mo. Cir. Ct. St. Louis County)

**Briggs v. Fletcher Auto. No. 7, LLC**, No. 10AO-CC003331 (Mo. Cir. Ct. Jasper County)

**Brown v. Suntrup Ford, Inc.**, No. 08SL-CC05103 (Mo. Cir. Ct. St. Louis County)

**Brown v. Zeiser Motors**, No. 0811-CV04298 (Mo. Cir. Ct. St. Charles County)

**Brunner v. Head Motor Co.**, No. 0811-CV04298 (Mo. Cir. Ct. Boone County)

**Bryant v. Motors Liquidation Co.**, No. 09-50026 (Bankr. S.D.N.Y.)

**Budeprion XL Mktg. & Sales Practices Litig.**, No. 2:09-CV-2811 (E.D. Pa.)

**Busby v. RealtySouth**, No. 2:04-CV -2799 (N.D. Ala.)

**Bush v. Cyber Asset Recovery, LLC**, No. MID-L-005132-10 (N.J. Middlesex County Ct.)

**Carlile v. Murfin Drilling Co., Inc.**, No. 13-CV-61 (Kan. Dist. Ct. Seward County)

**Charron v. Pinnacle Group, N.Y.**, No. 1:07-CV -6316 (S.D.N.Y.)

**Chulsky v. Hudson Law Offices, P.C.**, No. 3:10-CV-3058-FLW (D.N.J.)

**Conderman v. Jim Trenary Chevrolet, Inc.**, No. 0811-CV-11388 (Mo. Cir. Ct. St. Charles County)

**Cornett v. Samson Ress. Co.**, No. CJ-09-81 (Okla. Dist. Ct. Dewey County)

**Cox v. Max Motors II, LLC**, No. 09BS-CC00078 (Mo. Cir. Ct. Bates County)

**Cullan and Cullan, LLC, v. M-Qube, Inc.**, No. 8:13-CV-00172 (D. Ne.)

**Custom LED, LLC v. eBay Inc.**, No. 3:12-CV-00350 (N.D. Cal.)

**Davis Landscape, LTD. v. Hertz Equip. Rental Corp.**, No. 06-3830 (D.N.J.)

**DKW Constr., Co., Inc. & Brian Wood v. Southtown Dodge, Inc.**, No. 08SL-CC05106 (Mo. Cir. Ct. St. Louis County)



## CASE CITES

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### CONSUMER - CONTINUED

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**Dobson v. Dave Cross Motors, Inc.**, No. 1016-CV-26853 (Mo. Cir. Ct. Jackson County)

**Doherty v. The Hertz Corp.**, No. 1:10-CV-00359 (D. N.J.)

**Dugan v. Lloyds TSB Bank, PLC**, No. 3:12-CV-02549 (N.D. Cal.)

**Farno v. Ansure Mortuaries of Indiana, LLC**, No. 41C01-0910-PL-7 (Ind. Cir. Ct. Johnson County)

**Friess v. Layne Energy, Inc.**, No. 11-CV-57 (Kan. Dist. Ct. Wilson County)

**Fritzinger v. Angie's List, Inc.**, No. 1:12-CV-1118 (S.D. Ind.)

**Frost v. Ohio E. Express, Inc.**, No. 3:12-CV-3016 (N.D. Ohio)

**Gaffney v. Autohaus West, Inc.**, No. 09SL-CC00430 (Mo. Cir. Ct. St. Louis County)

**Gascho v. Global Fitness Holdings, LLC**, No. 2:11-CV-436 (S.D. Ohio)

**Gentry v. Reliable Auto., Inc.**, No. 0831-CV06073 (Mo. Cir. Ct. Greene County)

**Grant v. Onyx Acceptance Corp.**, No. 07-20315 (Fla. Cir. Ct. Broward County)

**Green v. American Cleaners and Laundry Co., Inc.**, No. 12SL-CC03095 (Mo. Cir. Ct. St. Louis County)

**Green v. Major Infiniti, Inc.**, No. 1116-CV09583 (Mo. Cir. Ct. Jackson County)

**Gregg v. Check Into Cash of Missouri, Inc.**, No. 11-CV-368 (W.D. Mo.)

**Gumm v. Joe Machens Ford, Inc.**, No. 08BA-CV03153 (Mo. Cir. Ct. Boone County)

**Hamilton v. Cash Am. of Missouri, Inc.**, No. 1216-CV-10576 (Mo. Cir. Ct. Jackson County)

**Heien v. Archstone Communities, LLC**, No. 1:12-CV-11079-RGS (D. Mass.)

**Hermida v. ASN Reading LLC**, No. 10-CV-12083-WGY (D. Mass.)

**Herrera v. Check 'n Go of California, Inc.**, No. CGC-07-4627790 (Cal. Super. Ct. San Francisco County)

**Hershey v. ExxonMobil Oil Corp.**, No. 6:07-CV-01300 (D. Kan.)

**Hewitt v. Law Offices of David J. Stern**, No. 50-2009-CA-036046 (Fla. Cir. Ct. Palm Beach County)

**Hollins v. Capital Solutions Invs., Inc.**, No. 11SL-CC04216 (Mo. Cir. Ct. St. Louis County)

**Hooper v. Suntrup Buick-Pontiac-GMC Truck, Inc.**, No. 0811-CV10921 (Mo. Cir. Ct. St. Charles County)

**Hopler v. Sapaugh Motors, Inc.**, No. 09JE-CC00146 (Mo. Cir. Ct. Jefferson County)

**Horn v. Commercial Lending Capital, Inc.**, No. RIC10019819 (Cal. Super. Ct. Riverside County)

**Howerton v. Cargill, Inc.**, No. 1:13-CV-00336 (D. Haw.)

**In the Matter of Xacti LLC**, No. 13C20192 (Or. Cir. Ct. Marion County)

**Janicki v. Jeffrey L. Rosen and Trustmark Recovery Serv. Inc.**, No. 1:13-CV-06759 (N.D. Ill.)

**Janoka v. Veolia Envtl. Servs. N. Am. Corp.**, No. 69-CV-2011-900056 (Ala. Cir. Ct. Barbour County)

**Johnson v. Washington Univ.**, No. 2:10-CV-4170 (W.D. Mo.)

**Jones v. Wells Fargo, N.A.**, No. BC337821 (Cal. Super. Ct. L.A. County)



## CASE CITES

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### CONSUMER - CONTINUED

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**Jones v. W. County BMW, Inc.**, No. 08SL-CC05222-01 (Mo. Cir. Ct. St. Louis County)

**Keirsev v. eBay, Inc.**, No. 12-Cv-01200-JST (N.D. Cal.)

**Khweye v. Leaders Fin. Co.**, No. ESX-L-5584-10 (N.J. Super. Ct. Essex County)

**Kreilich v. JL Autos, Inc.**, No. 09SL-CC0172 (Mo. Cir. Ct. St. Louis County)

**Lagas v. Verisma Sys., Inc.**, No. 4:13-CV-01082 (W.D. Mo.)

**Ledterman v. James Perse Enter., Inc.**, No. BC480530 (Cal. Super. Ct. L.A. County)

**LeFever v. Am. Ear Hearing Aid & Audiology**, No. 11-CV-0832 (Ohio Comm. Pl. Licking County)

**Lewellen v. Reliable Imports and RV, Inc.**, No. 1031-CV11926 (Mo. Cir. Ct. Greene County)

**Lippert v. Edison Motor Cars, Inc.**, No. MID-L-6599-10 (N.J. Super. Ct. Middlesex County)

**Livingston v. Capital One**, No. 3:07-CV-266 (M.D. Fla.)

**Love v. LendingTree Claims Admin.**, No. 2009CV009598 (Wis. Cir. Ct. Milwaukee County)

**Lucero v. Love, Beal & Nixon, P.C.**, No. 4:12-CV-659 (N.D. Okla.)

**Lundsford v. Woodforest Nat'l Bank**, No. 1:12-CV-103-CAP (N.D. GA.)

**Lundy v. Check Into Cash of Missouri, Inc.**, No. 1216-CV10150 (Mo. Cir. Ct. Jackson County)

**Lundy v. Mid-America Credit, Inc.**, No. 1116-CV02060 (Mo. Cir. Ct. Jackson County)

**Mayfield v. Thoroughbred Ford of Platte City, Inc.**, No. 08AE-CV00467 (Mo. Cir. Ct. Platte County)

**Metcalf v. Marshall Ford Sales, Inc.**, No. 0811-CV11381 (Mo. Cir. Ct. St. Charles County)

**Mikale v. John Bommarito Oldsmobile-Cadillac, Inc.**, No. 08SL-CC05223 & 09SL-CC00167 (Mo. Cir. Ct. St. Louis County)

**Miller v. Capital One Bank**, No. 3:07-CV-265 (M.D. Fla.)

**Miller v. Nat'l Enter. Sys., Inc.**, No. 13 C 1720 (N.D. Ill.)

**Motor Fuel Temperature Sales Practices**, No. 07-MD-1840-KHV (D. Kan.)

**Mortgage Store, Inc. v. LendingTree Loans**, No. 06CC00250 (Cal. Super. Ct. Orange County)

**Moy v. Eltman, Eltman & Cooper, P.C.**, No. 12-CV-02382 (E.D.N.Y.)

**Naes v. Tom Pappas Toyota, Inc.**, No. 0711-CV09005 (Mo. Cir. Ct. St. Charles County)

**Neese v. Lithia Chrysler Jeep of Anchorage, Inc.**, No. 3AN-06-4815 (Alaska Super. Ct. Anchorage)

**North Star Capital Acquisitions v. King**, No. 3:07-CV-264 (M.D. Fla.)

**Omar v. 950 B14 DE, LLC**, No. CGC-13-530203 (Cal. Super. Ct. San Francisco County)

**Omohundro v. Glendale Chrysler-Jeep, Inc.**, No. 2107CC-03927 (Mo. Cir. Ct. St. Louis County)

**Padberg v. Dish Network, LLC**, No. 11-4035 (W.D. Mo.)

**Painter v. Ackerman Motor Company, Inc.**, No. 1022-CC10135 (Mo. Cir. Ct. City of St. Louis)



## CASE CITES

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### CONSUMER - CONTINUED

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**Perkins v. Philips Oral Healthcare, Inc.**, No. 12-CV-1414H BGS (S.D. Cal.)

**Petersen v. Central Jersey Pool**, No. MON-L-4044-11 (N.J. Super. Ct. Monmouth County)

**In re Philips/Magnavox Television Litig.**, No. 2:09-CV-3072 (D. N.J.)

**Powers v. Fifth Third Mortg. Co.**, No. 1:09-CV-2059 (N.D. Ohio)

**Redd v. Suntrup Hyundai, Inc.**, No. 09SL-CC00173 (Mo. Cir. Ct. St. Louis County)

**Reid v. Unilever United States, Inc.**, No. 12-CV-6058 (N.D. Ill.)

**Rhodenbaugh v. CVS Pharmacy, Inc.**, No. 0916-CV09631 (Mo. Cir. Ct. Jackson County)

**Richards v. Lou Fusz Auto. Network, Inc.**, No. 08SL-CC04594 (Mo. Cir. Ct. St. Louis County)

**Richardson v. Weber Chevrolet Co.**, No. 09SL-CC00170 (Mo. Cir. Ct. St. Louis County)

**Riley v. Northland Group, Inc.**, No. 2:12-CV-00950 (E.D. Wis.)

**Rizzo v. Hendrick Auto. Group.**, No. 4:08-CV-137 (W.D. Mo.)

**Roberts v. Source for Public Data**, No. 2:08-CV -4167 (W.D. Mo.)

**Robinson v. J & C Auto Outlet, LLC**, No. MID-L-1961-13 (N.J. Super. Ct. Middlesex County)

**S37 Management, Inc. v. Advance Refrigeration Co.**, No. 06-CH-20999 (Ill. Cir. Ct. Cook County)

**Sams v. Adams Auto Corp.**, No. 0916-CV1521 (Mo. Cir. Ct. Jackson County)

**Seekamp v. It's Huge, Inc.**, No. 1:09-CV-00018 (N.D. N.Y.)

**Serochi, Jr. v. Bosa Dev. Cal. II, Inc.**, No. 37-2009-00096686-CU-BT-CTL (Cal Super. Ct. San Diego County)

**Schuster v. Machens Enters., Inc.**, No. 11BA-CV01269 (Mo. Cir. Ct. Boone County)

**Shaffer v. Royal Gate Dodge**, No. 07SL-CC00949 (Mo. Cir. Ct. St. Louis County)

**Sherrell v. Great S. Bank**, No. 1131-CV02280 (Mo. Cir. Ct. Greene County)

**Shirley v. Reliable Chevrolet, Inc.**, No. 0831-CV06082 (Mo. Cir. Ct. Greene County)

**Silverberg v. Hotels.com, LP**, No. 12-01819 (Tex. Dist. Ct.)

**Sims v. Rosedale Cemetery Co.**, No. 03-C-506 (W. Va. Cir. Ct. Berkeley County)

**Soper v. American Traffic Solutions, Inc.**, No. CACE 10-046095 (17<sup>th</sup> Cir. Ct. Broward County)

**Stasko v. City of Chicago**, No. 09-CH17167 (Ill. Cir. Ct. Cook County)

**State of Texas v. Bluehippo**, No. D-1-GV-10-000102 (Tex. Dist. Ct. Travis County)

**State of Texas v. Cristo Vive**, No. D-1-GV-12-001092 (Tex. Dist. Ct. Travis County)

**Steiner v. Rawlings Sporting Goods Co., Inc.**, No. 2:12-CV-02531 (D. N.J.)

**Stevens v. Bommarito Nissan, Inc.** No. 09SL-CC00167 (Mo. Cir. Ct. St. Louis County)

**Strickland v. Fletcher Auto., No. 9**, No. 09AP-CC00091 (Mo. Cir. Ct. Jasper County)

**In re Surewest Comm'ns Shareholder Litig.**, No. SCV-0030665 (Cal. Super Ct. Placer County)



## CASE CITES

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### CONSUMER - CONTINUED

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**Swires v. Glaxosmithkline**, No. 11-L-587 (Ill. Cir. Ct. St. Clair County)

**Thomas v. Tenet Healthsystems SL, Inc.**, No. 12SL-CC01811 (Mo. Cir. Ct. St. Louis County)

**Tortora v. Guardian Protection Servs., Inc.**, No. MID-L-1041-10 (N.J. Super. Ct. Middlesex County)

**Valley v. Johnny Londoff Chevrolet, Inc.**, No. 10SL-CC00523 (Mo. Cir. Ct. St. Louis County)

**Van Loo v. Capitol City Chrysler-Nissan, Inc.**, No. 11AC-CC00324 (Mo. Cir. Ct. Cole County)

**In re Voluntary Dissolution of Nexus Fiduciary Trust Corp.**, No. 29D03-1003-CC-323 (Ind. Super. Ct. Hamilton County)

**Wade v. Thoroughbred Ford, Inc.**, No. 10AE-CV04323 (Mo. Cir. Ct. Platte County)

**Walczak v. ONYX Acceptance Corp.**, No. 03 CH 0693 (Ill. Cir. Ct. Lake County)

**Wallace B. Roderick Revocable Living Trust, Trustee Amanda Roderick v. Noble Energy, Inc.**, No. 2009CV2 (Kan. Dist. Ct. Kearny County)

**Wallace B. Roderick Revocable Living Trust, Trustee Amanda Roderick v. Osborn Heirs Co., Ltd.**, No. 2009CV15 (Kan. Dist. Ct. Kearny County)

**Welsh v. John Youngblood Motors, Inc.**, No. 0931-CV14259 (Mo. Cir. Ct. Greene County)

**Westman v. Rogers Family Funeral Home, Inc.**, No C 98-03165 (Cal. Super. Ct. Contra Costa County)

**Wenger v. South Brunswick Furniture, Inc.**, No. MID-L-000479-12 (N.J. Middlesex County Ct.)

**Wiles v. S.W. Bell Tel. Co.**, No. 2:09-CV-4236 (W.D. Mo.)

**Wogoman v. Worth Harley Davidson N., Inc.**, No. 09CY-CV9090 (Mo. Cir. Ct. Clay County)

**Wood v. Plaza Tire Servs.**, No. 11SL-CC01507 (Mo. Cir. Ct. St. Louis County)

**Woods v. QC Fin.I Servs., Inc.**, No. 11-148-01395-09 (Am. Arb. Ass'n)

**Woodward v. Ozark Kenworth, Inc.**, No. 1031-CV02203 (Mo. Cir Ct. Greene County)

**Yarde v. Ed Napleton St. Louis Imports, Inc.**, No. 09SL-CC00171 (Mo. Cir. Ct. St. Louis County)

**Zaromb v. SSM Health Care Corp.**, No. 12SL-CC00654 (Mo. Cir. Ct. St. Louis County)

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### INSURANCE

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**Abrahams-Goullub v. United Servs. Auto. Assoc.**, No. 3AN-09-6693CI (Alaska Super. Ct. Anchorage)

**Appel v. Liberty Am. Ins. Co.**, No. 1:08-CV-20385 (S.D. Fla.)

**Besecker v. Peerless Indem. Ins. Co.**, No. 2:09-CV-05513-TJS (E.D. Pa.)

**Bower v. MetLife**, No. 1:09-CV-351 (S.D. Ohio)

**Casey v. Coventry Health Care of Kansas, Inc.**, No. 4:08-cv-201 (W.D. Mo.)

**Childs v. Unified Life Ins. Co.**, No. 4:10-CV-23 (N.D. Okla.)



## CASE CITES

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### INSURANCE - CONTINUED

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**Cressy v. Fidelity & Guaranty Life Ins. Co.**, No. BC514340 (Cal. Super. Ct. L.A. County)  
**Douglass v. Am. United Life Ins. Co.**, No. 29D03-9810-CP-00568 (Ind. Super. Ct. Hamilton County)  
**Holling-Fry v. Coventry Health Care of Kansas, Inc.**, No. 4:07-CV-0092 (W.D. Mo.)  
**Lujan v. Hallmark Ins. Co.**, No. D-101-CV-2012-01429 (N.M. Santa Fe County)  
**Martin v. Twin City Fire Ins. Co.**, No. 3:08-CV-5651 (W.D. Wash.)  
**Newendorp v. United Servs. Auto. Assoc.**, No. CJ-04-195S (Ok. Dist. Ct. Cleveland County)  
**Poutsch v. USAA Cas. Ins. Co.**, No. CV-2011-01210 (N.M. Dist. Ct. Bernalillo County)  
**Scott v. United Servs. Auto. Assoc.**, No. 2:11-CV-01422-JCC (U.S. Dist. Ct. W.D. Wash.)  
**San Allen v. Stephan Buehrer, Admin. of Ohio BWC**, No. CV-07-644950 (Ohio C.P. Cuyahoga County)  
**Walker v. Life Ins. Co. of the Sw.**, No. 10-CV-9198-JVS (C.D. Cal.)  
**Waterman v. USAA Cas. Ins. Co.**, No. 10-5016-TJS (E.D. Pa.)  
**Welschmeyer v. St. Luke's Health Sys., Inc.**, No. 1316-CV19250 (Mo. Cir. Ct. Jackson County)

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### EMPLOYMENT

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**Agatep v. Forest Lawn Mortuary**, No. BC433744 (Cal. Super. Ct. L.A. County)  
**Alexander v. Chevron Stations**, No. C11-00896 (Cal. Super. Ct. Contra Costa County)  
**Anzaldo v. The Original Mowbray's Tree Serv., Inc.**, No. S-1500-CV-274897 WDP (Cal. Super. Ct. Kern County)  
**Ayon v. Cintas Corp., Inc.**, No. BC310696 (Cal. Super. Ct. L.A. County)  
**Balderas v. Massage Envy Franchising, LLC**, No. 3:12-CV-06327 (N.D. Cal.)  
**Barbosa v. Cargill Meat**, No. CV F 11-00275 SKO (E.D. Cal.)  
**Bayard v. Veruzon W. Va., Inc.**, No. 1:11-CV-00132 (N.D. W. Va.)  
**Bedoya v. Rubio's Rests.**, No. BC463799 (Cal. Super. Ct. L.A. County)  
**Bell v. Delta Air Lines, Inc.**, No. 4:13-CV-01199 (N.D. Cal.)  
**Bendana v. Custom Air Trucking, Inc.**, No. BC456055 (Cal. Super. Ct. L.A. County)  
**Berg v. Zumiez Inc.**, No. BC408410 (Cal. Super. Ct. L.A. County)  
**Binissia v. ABM Indusies., Inc.**, No. 13-CV-1230 (N.D. Ill.)  
**Bonilla v. Agri-Empire**, No. RIC1209556 (Cal. Super. Ct. Riverside County)  
**Borja v. TNT Plastic Molding**, No. 30-2012-00423018-CU-OE-CXC (Cal. Super. Ct. Orange County)  
**Bradley v. Networkers, Inc.**, No. GIC 862417 (Cal. Super. Ct. San Diego County)



## CASE CITES

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### EMPLOYMENT - CONTINUED

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**Brooks v. U.S. Bank, N.A.**, No. 12-CV-4935 EMC (N.D. Cal.)

**Brown v. Abercrombie & Fitch Co.**, No. 2:14-CV-01242 (C.D. Cal.)

**Bult-Ito v. Univ. of Alaska**, No. 3AN 09-7875CI (Alaska Super. Ct. Anchorage)

**Burden v. SelectQuote**, No. C10-05966 SBA (N.D. Cal.)

**Bustos v. Massage Envy Spa - Mission Valley**, No. 37-2012-00104022-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Byard v. Verizon W. Va., Inc.**, No. 1:11-CV-132 (N.D. W. Va.)

**Calhoun v. Gen. Petroleum Corp.**, No. BC425216 (Cal. Super. Ct. L.A. County)

**Caracoza v. Ephonation.com, Inc.**, No. 30-2013-006892690-CU-CR-CXC (Cal. Super. Ct. Orange County)

**Cardenas v. Crothall Healthcare**, No. 11-4145 (C.D. Cal.)

**Carothers v. Lawry's The Prime Rib, Inc.**, No. 12-CV-10048 (N.D. Ill.)

**Cassidy v. Aldo U.S., Inc.**, No. 1:13-CV-04858 (N.D. Ill.)

**Castro v. Seaton, LLC**, No. BC516824 (Cal. Super. Ct. L.A. County)

**Chambers v. Chase Bank USA**, No. 1:11-CV-6014 (N.D. Ill.)

**Chavez v. Hat World, Inc.**, No. 1:12-CV-05563 (N.D. Ill.)

**Cherry v. Mayor and City Council of Baltimore**, No. 1:10-CV-01447 (D. Md.)

**Cioe v. Verizon Wireless**, No. 1:11-CV-1002 (N.D. Ill.)

**Cisneros v. Oasis South Ins. Servs.**, No. 37-2012-00103109-CU-OE-CTL (Cal. Super Ct. San Diego County)

**Clarke v. Insight Global, Inc.**, No. 3:13-CV-00357 (S.D. Cal.)

**Copi v. Brainfuse**, No. 11-CV-05195 (S.D.N.Y.)

**Crosby v. California Healthcare Medical Billing, Inc.**, No. 37-2011-00087583-CU-OE-CTL (Cal. Super Ct. San Diego County)

**D'Ambrosia v. Claro Italian Mkts.**, No. BC497301 (Cal. Super. Ct. L.A. County)

**Deliz v. Miller's Ale House, Inc.**, No. 13-CA-005176 (Fla. 13th Cir. Ct. Hillsborough County)

**Diaz v. Alco Iron & Metal Co.**, No. HG10517616 (Cal. Super. Ct. Alameda County)

**Diego v. JMS Prop. LLC**, No. 37-2013-00056177-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Dilts v. Penske Logistics, LLC**, No. 3:08-CV-00318 (S.D. Cal.)

**Dunlap v. Universal Sec. Corp.**, No. 10 CH 18197 (Ill. Cir. Ct. Cook County)

**Echeverria v. Adir Int'l**, No. BC395380 (Cal. Super. Ct. L.A. County)

**Epton v. AIS Servs., LLC**, No. 3:11-CV-00856-JM-POR (S.D. Cal.)

**Erickson v. QSP & TI Media Solutions, L.A.S.C.**, No. BC469830 (Cal. Super. Ct. L.A. County)





## CASE CITES

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### EMPLOYMENT - CONTINUED

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**Escoto-Miranda v. Evans Tire & Serc. Cents., Inc.**, No. 37-2012-00103102-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Fabela v. Micro World Corp.**, No. BC509643 (Cal. Super. Ct. L.A. County)

**Fischer v. Nat'l Distrib. Ctr. LP**, No. RIC1114952 (Cal. Super. Ct. Riverside County)

**Fitts v. Designed Metal Connections, Inc.**, No. TC027097 (Cal. Super. Ct. L.A. County)

**Flournoy v. 3S Network, Inc.**, No. C09-00113 (Cal. Super. Ct. Contra Costa County)

**Garner v. Primedia, Inc.**, No. 30-2012-00619014-CU-06-CXC (Cal. Super. Ct. Orange County)

**Gonzales v. Downtown LA Motors LP**, No. BC350769 (Cal. Super. Ct. L.A. County)

**Gonzalez v. RC Packing, LLC**, No. M108764 (Cal. Super. Ct. Monterey County)

**Grant v. Convergys Corp.**, No. 4:12-cv-000496-CEJ (E.D. Mo.)

**Haro v. Cotti Foods Corp.**, No. BC407056 (Cal. Super. Ct. L.A. County)

**Hobbs v. Ace Industrial Supplies, Inc.**, No. BC466122 (Cal. Super. Ct. L.A. County)

**Holsted v. R.J. Noble Co.**, No. 30-2010-00379770 (Cal. Super. Ct. Orange County)

**Jones v. TNT Self-Storage Mgmt., Inc.**, No. 30-2011-00513903-CU-OE-CXC (Cal. Super. Ct. Orange County)

**Kavousy v. The Western and Southern Life Ins. Co.**, No. 8:12-CV-2109 AG (C.D. Cal.)

**Kay v. Asian Rehabilitation Servs. Inc.**, No. BC442795 (Cal. Super. Ct. L.A. County)

**Khweye v. Leaders Fin. Co.**, No. ESX-L-5584-10 (N.J. Super. Ct. Essex County)

**King v. Build.com, Inc.**, No. 159985 (Cal. Super. Ct. Butte County)

**Kinney v. Harvest AI Mgmt. Sub, LLC**, No. 2:12-CV-02716-TLN-CKD (E.D. Cal.)

**Kulvicki v. Pick-N-Pull Auto Dismantlers**, No. RG11560441 (Cal. Super. Ct. Alameda County)

**Las v. ABM Indus. Inc.**, No. 1:11-CV-05644 (N.D. Ill.)

**Las v. District Towing, Inc.**, No. 12-CV-5538 (N.D. Ill.)

**Lopez v. Pioneer Med. Group, Inc.**, No. BC496710 (Cal. Super. Ct. L.A. County)

**Macias v. Sun Grown Organic Distrib., Inc.**, No. 37-2012-00095817-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Magee v. Am. Residential Servs., LLC**, No. BC423798 (Cal. Super. Ct. L.A. County)

**Martinez v. John Morrell & Co.**, No. 1-11-CV-198307 (Cal. Super. Ct. Santa Clara County)

**Myart v. AutoZone, Inc.**, No. 05CC03219 (Cal. Super. Ct. Orange County)

**Neponoceno v. El Puerto Berry Farms, LLC**, No. 56-2014-00451373-CU-OE-VTA (Cal. Super. Ct. Ventura County)

**Nimely v. Randstad Gen. Partner (US), LLC**, No. 1:12-CV-10431 (N.D. Ill.)





## CASE CITES

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### EMPLOYMENT - CONTINUED

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**O'Brien v. Cathy Jean, Inc.**, No. 37-2011-00085539-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Office of Fed. Contract Compliance Programs, U.S. Dep't of Labor v. Cargill Meat Solutions Corp.**, No. 2012-OFC-00001 (DOLOALJ)

**Ortiz v. CVS Caremark Corp.**, No. 12-CV-05859-EDL (N.D. Cal.)

**Park v. Staples the Office Superstore LLC**, No. BC449815 (Cal. Super. Ct. L.A. County)

**Pina v. Con-way Freight**, No. C10-00100 (N.D. Cal.)

**Recendez v. Tidwell**, No. 56-2011-00404761-CU-OE-VTA (Cal. Super. Ct. Venture County)

**Robinson v. Defender Sec. Co.**, No. RG10505016 (Cal. Super. Ct. Alameda County)

**Rocha v. Royal Oaks**, No. 5:12-CV-01303 (N.D. Cal.)

**Rodriguez v. Fred Loya Ins.**, No. BC491770 (Cal. Super. Ct. L.A. County)

**Roque v. Pick-N-Pull Auto Dismantlers**, No. 34-2012-00118782 (Cal. Super. Ct. Sacramento County)

**Rosero v. East L.A. Doctors Hosp., LP**, No. BC505483 (Cal. Super. Ct. L.A. County)

**Rothberg v. Crunch LLC**, No. CGC 12-519740 (Cal. Super. Ct. San Francisco County)

**Russell v. EF International Language Schs**, No. BC481435 (Cal. Super. Ct. L.A. County)

**Saba Mungaray v. Corovan Moving & Storage Co.**, No. 30-2012-00618398-CU-OE-CXC (Cal. Super. Ct. Orange County)

**Sano v. Southland Mgmt. Group, Inc.**, No. BC489112 (Cal Super. Ct. L.A. County)

**Salazar v. Adir Int'l**, No. BC398402 (Cal. Super. Ct. L.A. County)

**Salgado v. Shik Do Rak, Inc.**, No. BC432841 (Cal. Super. Ct. L.A. County)

**Sanchez v. St. Mary Med. Ctr.**, No. CIVDS 1304898 (Cal. Super. Ct. San Bernardino County)

**Scaglione v. M.O. Dion & Sons, Inc.**, No. BC425216 (Cal. Super. Ct. San Bernardino County)

**Schmaltz v. O'Reilly Automotive Stores, Inc.**, No. 4:12-CV-01056 (E.D. Mo.)

**Scott v. RailCrew Xpress, LLC**, No. 10C-000546 (Kan. Dist. Ct. Shawnee County)

**Shackleford v. Cargill**, No. 12-CV-4065-FJG (W.D. Mo.)

**Solorio v. Angelica Textile Servs, Inc.**, No. 5:12-CV- 03569 (N.D. Cal.)

**Sotelo v. Universal Indus. Finishing, Inc.**, No. 1-13-CV-239771 (Cal. Super. Ct. Santa Clara)

**Sparks v. FPI Mgmt., Inc.**, No. BC465773 (Cal. Super. Ct. L.A. County)

**Stevenson v. Falcon Critical Care Transp.**, No. CIVMSC09-00862 (Cal. Super. Ct. Contra Costa County)

**Studley v. Alliance Healthcare Servs., Inc.**, No. 8:10-CV-00067-CJC-AN (C.D. Cal)

**Tapia v. Pro's Ranch Mkts.**, No. S-1500-CV-274898 (Cal. Super. Ct. Kern County)

**Tula v ABM Indus. Inc.**, No. 1:12-CV-054-LY (W.D. Tex.)



## CASE CITES

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### EMPLOYMENT - CONTINUED

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**Tuter, Bauer v. King's Seafood Co.**, No. 37-2011-00084756-CU-OE-CTL (Cal. Super. Ct. San Diego County)

**Vaca v. Famarock, Inc.**, No. BC494504 (Cal. Super. Ct. L.A. County)

**Valencia v. Mobile Mini, Inc.**, No. RG-13-684308 (Cal. Super. Ct. Alameda County)

**Valencia v. SCIS Air Sec. Corp.**, No. BC421485 (Cal. Super. Ct. L.A. County)

**Valenzuela v. United Natural Foods W., Inc.**, No. BC450168 (Cal. Super. Ct. L.A. County)

**Veliz v. Cintas Corp.**, No. 5:03-CV-1180 (N.D. Cal.)

**Villarreal v. Source Refrigeration & HVAC, Inv.**, No. 1:12-CV-00243 (W.D. Tex.)

**Vincent v. Cent. Purchasing, LLC**, No. BC458544 (Cal. Super. Ct. L.A. County)

**Warren v. SCS-Chicago**, No. 10 CH 8380 (Ill. Cir. Ct. Cook County)

**Williams v. Ill. Title Loans, Inc.**, No. 13 CH 24303 (Ill. Cir. Ct. Cook County)

**Wilson v. Continental Vending, Inc.**, No. 30-2012-00585315-CU-OE-CXC (Cal. Super. Ct. Orange County)

**Wynn v. Express, LLC**, No. 1:11-CV-04588 (N.D. Ill.)

**Zaniewski v. PRRC Inc.**, No. 3:11-CV-01535 (D. Conn.)

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### BELAIRE-WEST PRIVACY NOTICE MAILINGS

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**Alegria v. Student Transp. Of America, Inc.**, No. RIC1209792 (Cal. Super. Ct. Riverside County)

**Anderson v. Gulf S. Safety Consultants, LLC**, No. BC537452 (Cal. Super. Ct. L.A. County)

**Angeles v Hofs Hut Rests. Inc.**, No. BC495624 (Cal. Super. Ct. L.A. County)

**Barajas v. WHM, LLC**, No. BC491045 (Cal. Super. Ct. L.A. County)

**Bradley v. Networkers, Inc.**, No. GIC 862417 (Cal. Super. Ct. San Diego County)

**Brueske v. DHSE, Inc.**, No. RIC1205382 (Cal. Super. Ct. Riverside County)

**Castellanos v. Faro Serv. Inc.**, No. BC509830 (Cal. Super. Ct. L.A. County)

**Davis v. St. Jude Hospital**, No. 30-2012-00602596-CU-OE-CXC (Cal. Super. Ct. Orange County)

**East v. Aces**, No. 11CECG04226 (Cal. Super. Ct. Fresno County)

**Erickson v. QSP & TI Media Solutions, L.A.S.C.**, No. BC469830 (Cal. Super. Ct. L.A. County)

**Fitts v. Designed Metal Connections, Inc.**, No. TC027097 (Cal. Super. Ct. L.A. County)

**Franco v. Flight Line Products, Inc.**, No. BC497382 (Cal. Super. Ct. L.A. County)

**Gonzales v. Corsair Elec. Connectors, Inc.**, No. 30-2012-00594399-CU-OE-CXC (Cal. Super. Ct. Orange County)

**Gutierrez v. Commerce Casino**, No. BC360704 (Cal. Super. Ct. L.A. County)

**Huizar v. Newport Serv. Corp.**, No. 30-2010-00430372-CY-OE-CXC (Cal. Super. Ct. Orange County)



## CASE CITES

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### BELAIRE-WEST PRIVACY NOTICE MAILINGS - CONTINUED

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**Jaramillo-Tabar v. Nakase Bros. Wholesale Nursery**, No. 30-2012-00587417 (Cal. Super. Ct. Orange County)

**Krajec v. Mission Hospital Regional Medical Cent.**, No. 30-2012-00602596-CU-OE-CXC (Cal. Super. Ct. Orange County)

**Linares v. PCAM, LLC**, No. BC487188 (Cal. Super. Ct. L.A. County)

**Murray v. Ralph's Grocery Co.**, No. RIC1105977 (Cal. Super. Ct. Riverside County)

**Navarro v. KJ Beck's, Inc.**, No. BC509096 (Cal. Super. Ct. L.A. County)

**Ornelas v. RVGC Partners, Inc.**, No. BC500123 (Cal. Super. Ct. L.A. County)

**Read v. Howroyd-Wright Emp't Agency, Inc.**, No. BC449744 (Cal. Super. Ct. L.A. County)

**Robinson v. Airgas On-Site Safety Servs., Inc.**, No. BC523502 (Cal. Super. Ct. L.A. County)

**Rodriguez v. E.M.E., Inc.**, No. BC518692 (Cal. Super. Ct. L.A. County)

**Rodriguez v. Equinox Holdings, Inc.**, No. BC437283 (Cal. Super. Ct. L.A. County)

**Sanchez v. CPG Foods, LLC**, No. BC487187 (Cal. Super. Ct. L.A. County)

**Scott-George v. PVH Corp.**, No. 13-CV-00441-TLN-DAD (E.D. Cal.)

**Serrano v. Triumph Structures-Los Angeles, Inc.**, No. BC507112 (Cal. Super. Ct. L.A. County)

**Shiferaw v. Sunrise Senior Living Mgmt., Inc.**, No. 2:13-CV-02171-JAK-PLA (C.D. Cal.)

**Smith v. Space Exploration Technologies Co., Inc.**, No. BC486776 (Cal. Super. Ct. L.A. County)

**Vagle v. Archstone Cmtys., LLC**, No. 2:13-CV-9044 RGK (C.D. Cal.)

**Vidales v. Windset Farms (Cal.), Inc.**, No. 1456106 (Cal. Super. Ct. Santa Barbara County)

**Walsh v. Pacific Bell Tel. Co.** No. 30-2011-00498062-CY-OE-CXC (Cal. Super. Ct. Orange County)

**Wilson v. Rock-Tenn Co., Inc.**, No. BC488456 (Cal. Super. Ct. L.A. County)

**Zamora v. Cardenas Markets, Inc.**, No. BC505451 (Cal. Super. Ct. L.A. County)

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### GOVERNMENT

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**Lopez-Venegas v. Jeh Johnson**, No. 2:13-CV-03972 (C.D. Cal.)

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### PRIVACY

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**Avery v. Boyd Bros. Transp., Inc.**, No. 4:13-CV-00579 (W.D. Mo.)

**Caffarello v. ADS Logistics Co., LLC**, No. 1:12-CV-08300 (N.D. Ill.)

**Diparvine v. A.P.S, Inc. d/b/a Car Quest Auto Parts**, No. 11-CV-6116 (N.D. Ill.)

**Edwards v. Impairment Res., LLC**, No. 112CV220583 (Cal. Super. Ct. Santa Clara County)



## CASE CITES

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### PRIVACY - CONTINUED

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**Fun Servs. of Kansas City, Inc. v. Hertz Equip. Rental Corp.**, No. 08-CV-03944 (Kan. Dist. Ct. Johnson County)

**Gordon v. Feinstein Raiss Kelin & Booker, LLC**, No. 3:13-CV-00089 (D. N.J.)

**Johnson v. Midwest Logistics Systems, Ltd.**, No. 2:11-CV-1061 (S.D. Ohio)

**Schulz v. Rushmore Service Center, LLC**, No. 2:13-CV-00105 (E.D. Wis.)

**Yaakoby v. EagleRider**, No. 1:09-CV-5772 (N.D. Ill.)

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### ANTITRUST

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**Kansas City Urology Care, PA, v. Blue Cross Blue Shield of Kansas City, Inc.**, No. 0516-CV-04219 (Mo. Cir. Ct. Jackson County)

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### SECURITIES

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**Capgrowth v. Franklin Elec. Publishers, Inc.**, No. BUR-C-043-09 (N.J. Super. Ct. Ch. Div. Burlington County)

**Waterford Twp. General Emps. Ret. System v. BankUnited Fin. Corp.**, No. 1:08-CV-22572-MGC (S.D. Fl.)

**Williams v. Colonial Prop. Trust**, No. 01-CV-2013-902416.00 (Ala. Cir. Ct. Jefferson County)

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### PERSONAL INJURY

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**Gray v. Derderian**, No. 1:04-CV-312 (D. R.I.)



## CASE CITES

### PREVIOUS CASES – JEFF AND KRISTIN DAHL

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#### CONSUMER

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Aks v. Southgate Trust Co., No. 92-2193-L (D. Kan.)

Alachua Gen. Hosp. v. Greene, No. 90-3359-CA (Fla. Cir. Ct. Alachua County)

Gray v. Derderian, No. 04-312L (D. R.I.)

Arscott v. Humana Hosp. Daytona Beach, No. 91-2478-CI-CI (Fla. Cir. Ct. Volusia County)

Benacquisto v. Am. Express Fin. Corp., No.00-1980 DSD (D. Minn.)

Bokusky v. Edina Realty, Inc., No. 3-92--223 (D. Minn.)

Bonilla v. Trebol Motors Corp., No. 92-1795(JP) (D. P.R.)

Bunch v. Rent-A-Center, Inc., No. 00-0364-CV-W-3 (W.D. Mo.)

Burney v. Thorn Ams., Inc., No. 97-CV.-1596 (Wis. Cir. Ct. Racine County)

Circle Plumbing v. Ferguson, No. 92-036478 (Tex. Dist. Ct. Harris County)

Cook v. LADA, No. 94-1730 (W.D. La.)

Crocker v. Sunshine Corp., No. 93-2224-H/A (W.D. Tenn.)

Dismuke v. Edina Realty, Inc., No. 92-8716 (Minn. Dist. Ct. Hennepin County)

Dyson v. Flagstar Corp., No. DKC93-1503 (D. Md.)

Fed. Trade Comm’n v. Mylan Labs., Inc., No. 1:98-CV-3114 (TFH) No. 990276 (TFH/JMF)

Garcia v. Houston Nw. Medical Ctr., Inc., No. H-94-2276, (S.D. Tex.)

George v. BancOhio Nat’l Corp., No. C2-92-314 (S.D. Ohio)

Guterman v. Am. Airlines, Inc., No. 95 CH 982 (Ill. Cir. Ct. Cook County)

Hartings v. Am. Express Co., No. 88-0744 (W.D. Pa.)

Hinton v. ColorTyme Inc., No. 94-CV. 5198 (Wis. Cir. Ct. Milwaukee County)

In re Compact Disc Minimum Advertised Price Antitrust Litig., No. 1361 (D. Me.)

In re Toys R Us Antitrust Litig., No. 98 M. D. L. 1211 (NG) (JLC) (E.D. N.Y.)

LaMontagne v. Hurley State Bank, No. 97-30093-MAP (D. Mass.)

Nitti v. Edina Realty, Inc., No. 3-92--386 (D. Minn.)

Ridgeway v. Denny’s California, No. C93-20202 JW (PV.T) (N.D. Cal.)

Rowland v. Goldkist, Inc., No. CV. 94-106 (Ala. Cir. Ct. Walker County)

Sparano v. Southland Corp., No. 04 C 2098 (N.D. Ill.)

Connecticut v. Mylan Labs., Inc., No. 1:98-CV-3115 (TFH) Misc. No. 990276 (TFH/JMF) (D.D.C.)

Thomas v. Charles Schwab & Co., Inc., No. 66,7000 (La. Dist. Ct. Natchitoches Parish)



## CASE CITES

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### CONSUMER - CONTINUED

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Toledo Fair Hous. Ctr. v. Nat'l Mut. Ins. Co., No. 93-1685 (Ohio C.P. Lucas County)  
U.S. v. Am. Family Mut. Ins., No. 90-C-0759 (E.D. Wis.)  
Weiss v. Washington, No. 99-2-11807-3 KNT (Wash. Super. Ct. King County)  
Weissberg v. Delta Air Lines, Inc., No. 88 CH 4846 (Ill. Cir. Ct. Cook County)  
Whitson v. Heilig-Meyers Furniture Co., No. CV. 94-PT-0309-E (N.D. Ala.)  
Wolens v. Am. Airlines, Inc., No. 88CH 7554 (Ill. Cir. Ct. Cook County)  
Woosley v. California, No. CA 000499 (Cal. Super. Ct. L.A. County)  
Yoel v. N.J. Nat'l Bank, No. 94-4675 (MLP) (D. N.J.)

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### EMPLOYMENT

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Allen v. Thorn Ams., Inc., Case No. 97-1159-CV.-W-SOW (W.D. Mo.)  
Babbitt v. Albertson's Inc., No. C92-1883 WHO (N.D. Cal.)  
Berquist v. Am. Family Mut. Ins. Co., No. 96CV (Wis. Cir. Ct. St. Croix County)  
Borja v. Wal-Mart Stores, Inc., No.98-CV-119 (Colo. Dist. Ct. Las Animas County)  
Brunson v. City of New York, No. 94 Civ. 4507 (LAP) (S.D.N.Y.)  
Forbush v. J. C. Penney Co., No. 3:90-2719-X, No. 3:92-0109-X (N.D. Tex.)  
Hofer v. Capitol Am. Life Ins. Co., No. 336 (Wyo. Dist. Ct. Goshen County)  
Hoffman v. Sbarro, Inc., No. 982 F. Supp. 249 (S.D.N.Y.)  
Khan v. Denny's Holdings, Inc., No. BC 177254 (Cal. Super. Ct. L.A. County)  
Merk v. Jewel Foods, No. 85 C 7876 (N.D. Ill.)  
OCAW v. Am. Home Prods., No. 92-1238 (JP) (D.P.R.)  
Stender v. Lucky Stores, Inc., No. 88-1467 (N.D. Cal.)  
Taylor v. O' Charley's, No. 3-94-0489 (M.D. Tenn.)  
Wooten v. Dillard's Inc., No. 99-0990-CV-W-3-ECF (W.D. Mo.)



## CASE CITES

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### INSURANCE

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Barnicle v. Am. Gen. Corp., No. EC 011 865 (Cal. Super. Ct. San Diego County)

Beavers v. Am. Gen. Fin., Inc., No. CV.-94-174 (Ala. Cir. Ct. Walker County)

Blanke v. Lincoln Nat'l Life Ins. Co., No. 512,048 Div. K (La. Dist. Ct. Jefferson Parrish)

Bussie v. Allmerica, No. 97-40204 (D. Mass.)

Danko v. Erie Ins. Exch., No. 298 1991 G.D. (Pa. C.P. Fayette County)

Elkins v. Equitable Life Ins. Co. of Iowa, No. 96-296-CIV.-T-17B (M.D. Fla.)

Garst v. Franklin Life Ins. Co., No. 97-C-0074-S (N.D. Ala.)

Green v. Metro. Ins., No. 969547 (Cal. Super. Ct. S.F. County)

Hearth v. First Nat'l Life Ins. Co. of Am., No. 95-818- T-21A (M.D. Fla.)

In re Lutheran Bhd. Variable Ins. Prods. Co., No. 99-MD-1309 (PAM/JGL)

In re Metro. Life Ins. Co., No. 96-179 MDL No. 1091 (W.D. Pa.)

In re Nat'l Life Ins. Co., No. 2-97-CV.-314 (D. Vt.)

Jordan v. State Farm Life Ins., No. 97 CH 11 (Ill. Cir. Ct. McLean County)

Kolsrud v. Equitable Life Ins. Co. of Iowa, No. 320838 (Ariz. Super. Ct. Pima County)

Kreidler v. W.-S. Life Assurance Co., No. 95-CV-157 (Ohio C.P. Erie County)

Lee v. USLIFE Corp., No. 1:97CV. -55-M (W.D. Ky.)

Levin v. Am. Gen. Life Ins. Co., No. 3-98-0266 (M.D. Tenn.)

Ludwig v. Gen. Am. Life Ins. Co., No. 4:97CV.18920 CDP (E.D. Mo.)

McNeil v. Am. Gen. Life & Accident Co., No. 3-99-1157 (M.D. Tenn.)

Reyes v. Country Life Ins. Co., No. 98 CH 16502 (Ill. Cir. Ct. Cook County)

Thompson v. Metro. Life Ins. Co., No. 00 Civ. 5071 (HB) Also applies to No.00 Civ., 9068, No.01-2090 & No. 01 Civ. 5579 (U.S. Dist. Ct. S.D. N.Y.)

Woodley v. Protective Life Ins. Co., No. CV. 95-005 (Ala. Cir. Ct. Fayette County)



## CASE CITES

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### PRODUCT LIABILITY

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Ahearn v. Fibreboard, No. 6:93cv.526 (E.D. Tex.)

Cox v. Shell Oil Co., No. 18,844 (Tenn. Ch. Ct. Obion County)

Garza v. Sporting Goods Props. Inc., No. SA 93-CA-1082 (W.D. Tex.)

Hart v. Central Sprinkler Corp., No. BC176727 (Cal.Super. Ct. L.A. County)

In re Louisiana-Pacific Corp. Inner-Seal Oriented Strand Bd. Trade Practices Litig., No. C96-2409 VRW (Mellett), No. C96-2468 VRW (Stewart) No. C95-3178 VRW(Aguis)

In re Rio Hair Naturalizer Prods. Liab. Litig., No. 1055 (E.D. Mich.)

Ruff v. Parex, Inc., No. 96-CV.-500-59 (E.D.N.C.)

Salah v. Consolidated Indus., Inc., No. CV 738376 (Cal. Super. Ct. Santa Clara County)

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### PROPERTY

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Anderson v. Cedar Grove Composting, Inc., No. 97-2-22820-4SEA (Wash. Super. Ct. King County)

Black v. Fag Bearings Corp., No. CV.396-264CC (Mo. Cir. Ct. Newton County)

Branin v. Asarco, Inc., No. C93-5132 (B) WD (W.D. Wash.)

Brighton v. Cedar Grove Composting, No. 97-2-21660-5 SEA (Wash. Super. Ct. King County)

Campbell v. Paducah & Louisville Ry., Inc., No. 93-CI-05543 (Ky. Cir. Ct. Jefferson County)

Comfort v. Kimberly-Clark Corp., No. DV. -90-616 (Ala. Cir. Ct. Shelby County)

Vicwood v. Skagit, No. 00-2-00665-6 (Wash. Super. Ct. Thurston County)

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### BANKRUPTCY

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In re Celotex Corp., No. 90-10016-8B1, 90-10017-8B1 (M.D. Fla.)

In re Raytech Corp., Case No. 89-00293 (Bankr. Ct. Conn.)

In re the Babcock & Wilcox Co., No. 00-0558 Bankr Case No. 00-10992 Sect: "R" (5) (U.S. Dist. Ct. E.D. La.)

In re U.S. Brass Corp., No. 94-40823S (Bankr. Ct. E.D. Tex.)

In re W.R. Grace & Co., No. 01-01139 (Bankr. Ct. Del.)





## CASE CITES

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### SECURITIES

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**Eilers Furs of Rapid City v. US West Commc'ns, Inc., No. 92-5121 (D.S.D.)**

**Finucan v. Egghead, Inc., No. C93-1268WD (W.D. Wash.)**

**Global Research Analyst Settlement, (M.D. N.Y.)**

**In re Chambers Dev. Corp. Sec. Litig., No. 982 (W.D. Pa.)**

**United States Sec. Exch. Comm'n v. HealthSouth Corp., No. CV-03-J-06515S (N.D. Ala.)**

**In re Banc of America Sec. LLC, File No. 3-12591 (Secs. Exch. Comm'n)**

**United States Sec. Eexch. Comm'n v. MBIA, No. 07Civ. 658 (LLS) (S.D.N.Y.)**

**United States Sec. Exch. Comm'n v. Fed. Nat'l Mortg. Assoc., No. 1:06-CV-00959 (RJL) (D.D.C.)**

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### BELAIRE-WEST PRIVACY NOTICE MAILINGS

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**Berg v. Zumiez, Inc., No. BC408410 (Cal. Super. Ct. L.A. County)**

## **Exhibit 2**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEBRASKA**

CULLAN AND CULLAN LLC, On  
behalf of themselves and all others  
similarly situated,

Plaintiff,

V.

M-QUBE, INC., et al.

Defendants.

Case No. 8:13-cv-00172

**DECLARATION OF JOHN GRUDNOWSKI IN SUPPORT OF**  
**THE NOTICE PLAN FOR THE TWO CLASS ACTION SETTLEMENTS**

I, John Grudnowski, declare:

1. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto.
2. I am Founder and CEO of FRWD Co. (“FRWD”), a digital marketing firm based in Minneapolis, Minnesota. My firm has been asked by Dahl Administration, LLC (“Dahl”) to partner in the design and execution of the Notice Plan for the settlements in the above-captioned action (the “Settlements”).
3. I have more than 19 years of experience in marketing and public relations. In the past 14 years, I have focused exclusively on digital media. In addition to founding FRWD in 2009, I also co-founded a Minneapolis-based media organization, i612, which

provides educational content to the Minneapolis/St. Paul marketing community. I also serve as an Adjunct Professor in Digital Marketing at the University of Minnesota's Carlson School of Management.

4. My work has involved designing, executing, and validating digital media advertising and communications campaigns. The technologies and tools described herein are well-accepted, leading practices in the digital advertising world and are directly transferable and applicable to the execution of an effective class action notice plan.

5. This declaration describes advertising industry trends and practices as well as the media approach and methodology for the Notice Plan for the Settlements.

6. FRWD and Dahl constructed the Notice Plan to be consistent with, and to take advantage of, how individuals consume media and locate information today. Specifically, we are leveraging digital components including mobile web banners, mobile in-app, and social media, as described in the Affidavit of Jeffrey D. Dahl. Leveraging how today's consumer accesses media enables us to construct a more robust, action-oriented notification plan. In addition, as we constructed the Notice Plan, we focused on demographic information provided by Defendants specific to their customer base. This information enables us to better target our Notice Plan and reach potential Class Members. This audience was selected based on demographic information, and media consumption, as stated above, as well as, through tools provided by Gfk MRI, eMarketer, Facebook comScore and Google.

7. Between the web, mobile and social media components of the Notice Plan, our tools indicate we will produce over 160 million notice impressions targeted at mobile phone users.

### **FRWD BACKGROUND**

8. Over the past six years, my company has planned, managed, executed, and reported on thousands of individual digital & traditional (TV, Print, Radio, Out of Home (OOH)) executions for some of the world's largest brand advertisers and business-to-business organizations. FRWD clients have included American Express, L'Oreal, Best Buy, General Mills, Colgate, Disney, Deluxe, Blue Cross Blue Shield, Scholastic, Proctor & Gamble, Coca-Cola, Target, Allianz, Thrivent Financial, and 3M.

9. "Digital media executions" are advertising, communications, or marketing activities directed at the online audience. Digital media executions can be a single event or a more coordinated, long-term campaign, and are done using online advertising tactics such as paid search, display, video, mobile, social media, and other forms of paid media. Each of these approaches is designed to reach a defined target audience in the online spaces where people increasingly seek and obtain information. In executing this Notice Plan, FRWD will employ display tactics—specifically, placing banner advertisements on specific mobile website, mobile applications and social media websites—to reach our intended audience.

10. In my past six years as CEO of FRWD, and in my previous eight years in digital media marketing, I have overseen all aspects of digital & traditional media executions, ranging from strategic and creative design, to planning, to identification of

technology partners, to integration of technology, to media buying, to optimizations of media executions. I have personally managed more than \$120 million in digital and traditional media executions. I have been hired by Fortune 500 clients to train their internal teams on digital media technology and management. I have hired and trained more than 100 employees and personally integrated third-party, industry-leading technologies and research providers such as DoubleClick DFA, comScore, Terminal One, Nielsen, Nielsen Catalina Solutions, eMarketer and others which enable greater control of reach/frequency management, audience targeting, and verification, all of which will be applied in this case to implement an effective class action Notice Plan. In addition to digital media executions, I have personally overseen advertising programs that included digital and print as well as and digital and television. In 1999-2000, I personally managed newspaper and Outdoor advertising placements for Northwest Airlines.<sup>1</sup> This experience at all stages of a media campaign, from planning through execution and training, provides a solid foundation of experience that informs my work on this Notice Plan.

11. As part of FRWD's execution of multimedia campaigns, we have planned, designed, built, placed, and reported on tens of thousands of individual web-based creative assets such as banner ads, websites, mobile applications, keyword search ads, Facebook landing pages, and other forms of content development.

12. Areas of special expertise and focus for FRWD include local (city and state level) and national advertising focused on achieving specific reach and frequency targets. We use all of the digital tactics listed above. Over the past six years, FRWD has

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<sup>1</sup> Northwest Airlines merged with Delta Airlines in 2008 under the Delta name.

completed more than 800 individual digital media campaigns focused on a specific locale (geo-footprint), combined with audience targeting and very specific reach and frequency goals. We have done so for brands including Cheerios, Wheaties, Yoplait, Covergirl, Olay, Charmin, and Colgate.

### **ADVERTISING TRENDS**

13. In the past decade, and specifically within the past five years, consumers have significantly shifted their consumption of media from print-based consumption to online-based consumption. In response to this consumer shift in consumption, advertisers have shifted their spending from print-based to online-based advertising.

14. The major driver behind these shifts is technology and its impact on consumers' time with media each day. As reported by eMarketer,<sup>2</sup> U.S. adults in 2008 spent a combined 63 minutes every day reading magazines and newspapers.<sup>3</sup> In 2011, that number had declined to 44 minutes per day, a decline in usage of 30%. In 2015, that number has declined to 21 minutes, a decline of 109% in the last 4 years alone.<sup>4</sup> During that same time period from 2011 to 2015, daily time spent via digital (online and mobile) has increased from 232 minutes per day to 338 minutes per day, a 50% increase. Thus, the average U.S. adult in 2015 now spends 16 times more time each day consuming media and information online than reading newspapers and magazines.

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<sup>2</sup> eMarketer aggregates more than 4,000 sources of digital marketing and media research and publishes objective analysis of internet market trends. For more than a decade, leading brands and agencies have relied on eMarketer as a recognized resource for data, analysis, and insights on digital marketing, media, and commerce. eMarketer clients include Google, General Motors, and Kimberly Clark. FRWD is also a client.

<sup>3</sup> eMarketer, Dec., 2011.

<sup>4</sup> eMarketer, April, 2015.

**Average Time Spent per Day with Major Media by US Adults, 2011-2015**

*hrs:mins and CAGR*

	2011	2012	2013	2014	2015	CAGR (2011-2015)
<b>Digital</b>	<b>3:40</b>	<b>4:20</b>	<b>4:51</b>	<b>5:15</b>	<b>5:38</b>	<b>11.4%</b>
—Desktop/laptop*	2:33	2:27	2:19	2:22	2:22	-1.8%
—Mobile (nonvoice)	0:48	1:35	2:16	2:34	2:51	37.2%
—Other connected devices	0:18	0:18	0:17	0:19	0:25	7.8%
<b>TV**</b>	<b>4:34</b>	<b>4:38</b>	<b>4:31</b>	<b>4:22</b>	<b>4:15</b>	<b>-1.8%</b>
<b>Radio**</b>	<b>1:34</b>	<b>1:32</b>	<b>1:30</b>	<b>1:28</b>	<b>1:27</b>	<b>-2.0%</b>
<b>Print**</b>	<b>0:44</b>	<b>0:38</b>	<b>0:32</b>	<b>0:26</b>	<b>0:21</b>	<b>-17.0%</b>
—Magazines	0:18	0:16	0:14	0:12	0:10	-13.5%
—Newspapers	0:26	0:22	0:18	0:14	0:11	-19.8%
<b>Other**</b>	<b>0:39</b>	<b>0:38</b>	<b>0:31</b>	<b>0:26</b>	<b>0:24</b>	<b>-11.7%</b>
<b>Total</b>	<b>11:11</b>	<b>11:46</b>	<b>11:55</b>	<b>11:57</b>	<b>12:04</b>	<b>1.9%</b>

*Note: ages 18+; time spent with each medium includes all time spent with that medium, regardless of multitasking; for example, 1 hour of multitasking on desktop/laptop while watching TV is counted as 1 hour for TV and 1 hour for desktop/laptop; \*includes all internet activities on desktop and laptop computers; \*\*excludes digital*  
*Source: eMarketer, April 2015*

188127

www.eMarketer.com

15. The data on the total percentage of the average U.S. adult's interaction with media are similar. Time online (mobile and traditional Internet) in 2010 made up 33.3% of the average person's total media consumption each day. In 2015 time online is now 44.6%. In 2010, time with newspapers and magazines combined for 8.2% of the average person's consumption, down from 10.8% in 2008.<sup>5</sup> In 2015, time spent with newspapers and magazines is at 1.7%.

16. This shift in consumer consumption of media has led to widespread adoption of online advertising and a concurrent decline in reliance on print media.

<sup>5</sup> *Id.*



Industry-wide, this impact is evident from another eMarketer study. In the year 2000, advertisers spent a collective \$72.68 billion on magazine and newspaper advertising.<sup>6</sup> In 2005, this number increased to \$74.14 billion. It has since been on a significant and steady decline, totaling \$51.54 billion in 2009 and projecting to \$31.6 billion in 2015.<sup>7</sup>

17. Unsurprisingly, advertisers have shifted their expenditures to meet consumers where they are: online. In 2000, advertisers spent \$6.0 billion online. In 2005, that number increased to \$10.0 billion. In 2009, the amount dedicated to online advertising reached \$20.3 billion.<sup>8</sup> In 2012, the amount dedicated to online advertising reached \$36.8 billion and is projected to reach \$52.5 billion in 2015.<sup>9</sup>

<b>US Total Media Ad Spending, by Media, 2011-2017</b>							
<i>billions</i>							
	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>TV</b>	<b>\$60.7</b>	<b>\$64.5</b>	<b>\$66.4</b>	<b>\$68.5</b>	<b>\$70.0</b>	<b>\$73.1</b>	<b>\$75.3</b>
<b>Digital</b>	<b>\$32.0</b>	<b>\$36.8</b>	<b>\$42.3</b>	<b>\$47.6</b>	<b>\$52.5</b>	<b>\$57.3</b>	<b>\$61.4</b>
—Mobile	\$1.6	\$4.4	\$8.5	\$13.1	\$18.6	\$24.7	\$31.1
<b>Print</b>	<b>\$35.8</b>	<b>\$34.1</b>	<b>\$32.9</b>	<b>\$32.2</b>	<b>\$31.6</b>	<b>\$31.3</b>	<b>\$31.2</b>
—Newspapers*	\$20.7	\$18.9	\$17.8	\$17.1	\$16.6	\$16.2	\$16.1
—Magazines*	\$15.2	\$15.2	\$15.1	\$15.1	\$15.1	\$15.1	\$15.2
<b>Radio**</b>	<b>\$15.2</b>	<b>\$15.4</b>	<b>\$15.6</b>	<b>\$15.9</b>	<b>\$16.0</b>	<b>\$16.0</b>	<b>\$16.1</b>
<b>Outdoor</b>	<b>\$6.4</b>	<b>\$6.7</b>	<b>\$7.0</b>	<b>\$7.2</b>	<b>\$7.4</b>	<b>\$7.6</b>	<b>\$7.8</b>
<b>Directories*</b>	<b>\$8.2</b>	<b>\$7.5</b>	<b>\$6.9</b>	<b>\$6.4</b>	<b>\$5.9</b>	<b>\$5.5</b>	<b>\$5.3</b>
<b>Total</b>	<b>\$158.3</b>	<b>\$165.0</b>	<b>\$171.0</b>	<b>\$177.8</b>	<b>\$183.4</b>	<b>\$190.9</b>	<b>\$197.0</b>
<i>Note: eMarketer benchmarks its US newspaper ad spending projections against the NAA, for which the last full year measured was 2012, and its US outdoor ad spending projections against the OAAA, for which the last full year measured was 2011; numbers may not add up to total due to rounding; *print only; **excludes off-air radio &amp; digital</i> <i>Source: eMarketer, Aug 2013</i>							
161679				www.eMarketer.com			

<sup>6</sup> ZenithOptimedia, Apr. 7, 2010; provided to eMarketer by StarcomMediaVest Group, June 1, 2010.

<sup>7</sup> eMarketer April, 2015

<sup>8</sup> Internet Advertising Bureau Revenue Report, <http://www.iab.net/AdRevenueReport>.

<sup>9</sup> eMarketer April, 2015

18. I have personally participated in this evolution from print to digital advertising and understand advantages that digital media tools offer. It is my opinion that using digital advertising, supplemented with selected print advertising, in this Notice Plan offers an effective route to reach members of the Settlement Classes (referenced collectively herein as “Settlement Class Members”) and inform them about the Settlements.

**DEFINITION OF TARGET: AUDIENCE TARGETING AND VERIFICATION**

19. Online notice advertising affords multiple options to reach and verify that the Settlement Class Members were exposed to the Notice. In the course of targeting, FRWD worked with Dahl to balance targeting and efficiency in reaching Settlement Class Members most effectively.

20. We have the ability to target individuals according to different demographic and psychographic (lifestyle and interest) characteristics. This is done by focusing our notification advertising on specific websites (domains) which index highly against our core target. As indicated in Paragraphs 6 and 7 above, this notification plan is focused primarily on US Adults who consume media via the mobile web, mobile application and social media. Leveraging industry leading digital tools such as comScore, Facebook and Google, FRWD has selected hundreds of mobile websites and mobile applications on which our audience visits at a rate greater than the typical Internet population. These custom lists are a best practice in consumer advertising and will further strengthen our ability to provide notice to Settlement Class Members in this plan. In this case, control of the mobile websites and apps that show the Notice, and where the Notice banner will

appear on those websites, provides a higher likelihood of successfully exposing Settlement Class Members to the Notice.

21. A full list of specific website domains on our list of potential targets is included as Exhibit 4 to the Affidavit of Jeffrey D. Dahl.

22. In addition to selecting specific mobile websites and mobile applications, we are leveraging Facebook Interest Targeting<sup>10</sup> which provides the opportunity to reach Settlement Class Members based on information they have added to their Facebook timelines. This considers information such as the Facebook Pages they like, apps they use, and other information they have added to their timelines.

#### **CONNECTION TO THE NOTICE WEBSITE**

23. All digital communication in the form of mobile web and mobile application-based banners, keyword search and social media will be connected to our notice website. Specifically, our banner notices will list the Settlement website, and users who click on our banner notices will be routed directly to the Settlement website, where they will find information in greater detail. This combination of reaching our audience and connecting to greater detail via the website for the Settlements (hereinafter “Settlement website”) provides us with a comprehensive approach to reaching Settlement Class Members.

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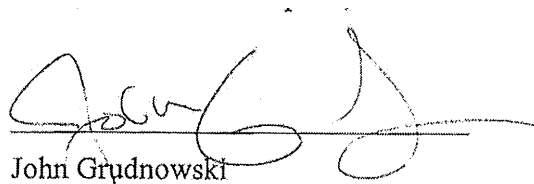
<sup>10</sup> Facebook, <https://www.facebook.com/help/131834970288134/>.

24. In addition, FRWD will leverage Google Analytics<sup>11</sup> (“GA”) on the Settlement website. By using GA, FRWD can showcase reporting on the engagement of the Settlement Class Members on our Settlement website. Specifically, GA will measure the most highly trafficked content and the total number of Settlement Class Members performing specific actions, such as the number of visitors, the number of pages viewed, the time spent, and the number of documents downloaded by type.

### **CONCLUSION**

25. Based on my experience in designing and executing digital outreach and marketing plans, as well as industry best practices, it is my opinion that the published notice component of the Notice Plan will effectively reach Settlement Class Members and contribute more than 160 Million targeted impressions.

I declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge. Executed this 21<sup>st</sup> day of December, 2015 in Minneapolis, Minnesota.



John Grudnowski  
CEO  
FRWD Co.

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<sup>11</sup> Google Analytics is a service offered by Google that generates detailed statistics about the visitors to a website. GA can track visitors from all referring websites.

## **Exhibit 3**

## Mobile Internet and Applications

If you are a current or former Wireless Subscriber and have been texted or billed without prior authorization,  
**Two Class Action Settlements May Affect Your Rights.**

CLICK HERE  
FOR MORE  
INFORMATION

## Search

### Class Action Settlement

 [www.CullenSettlement.com](http://www.CullenSettlement.com)

Current/Former mobile phone user?  
Your rights may be affected.

## Social Media

Visit the  
Settlement Site for  
More Details

### Wireless Provider Settlement

[www.CullenSettlement.com](http://www.CullenSettlement.com)

If you are a current or former Wireless  
Subscriber. Two Class Action Settlements  
May Affect Your Rights.

## **Exhibit 4**

## Website Application and Domain List

**Mobile Applications**

ACCUWEATHER  
 AMAZON  
 AOL  
 APPLE  
 CLASSMATES  
 CNN  
 CRAVEONLINE  
 CRICBUZZ  
 DAILYMAIL.CO.UK  
 DESERETNEWS  
 DISCUSS.HK  
 ELNUEVOHERALD  
 ESPN.GO  
 FACEBOOK  
 FOX23  
 FOXNEWS  
 FOXNEWS.MOBI  
 GIZMODO  
 GO  
 GOOGLE  
 INMOBI  
 INSTAGRAM  
 KCCI  
 KENS5  
 KETV  
 KINGJAMESBIBLEONLINE.ORG  
 KOAT  
 KOMPAS  
 LIFEHACKER  
 MERRIAM-WEBSTER  
 MOVIEWEB  
 NYTIMES  
 ON.CC  
 ORIGIN.SALON  
 REDDIT  
 REFERENCE  
 SALON  
 SENEGO  
 SONGZA  
 SUNTIMES  
 THESAURUS  
 TRULIA  
 TUTTOMERCATOWEB  
 TWITCHY  
 TWITTER  
 WALL STREET JOURNAL  
 WASHINGTONPOST  
 WBALTV  
 WCPO  
 WCVB  
 WEATHER  
 WEATHERBUG  
 WHATTOEXPECT  
 WMUR  
 WORD  
 WORDREFERENCE  
 WSB RADIO  
 WTVB  
 YAHOO  
 ZYNGA

**Mobile Websites**

GOOGLE.COM  
 FACEBOOK.COM  
 YAHOO.COM  
 YOUTUBE.COM  
 MSN.COM  
 AMAZON.COM  
 WIKIPEDIA.ORG  
 BING.COM  
 BLOGGER.COM  
 ASK.COM  
 LIVE.COM  
 EBAY.COM  
 ABOUT.COM  
 EHOW.COM  
 MICROSOFT.COM  
 CRAIGSLIST.ORG  
 AOL.COM  
 MSNBC.COM  
 APPLE.COM  
 WORDPRESS.COM  
 CNN.COM  
 WEATHER.COM  
 HUFFINGTONPOST.COM  
 TWITTER.COM  
 LINKEDIN.COM  
 MAPQUEST.COM  
 GO.COM  
 WALMART.COM  
 IMDB.COM  
 YELP.COM  
 YELLOWPAGES.COM  
 MYSPACE.COM  
 FLICKR.COM  
 NYTIMES.COM  
 ADOBE.COM  
 ESPN.COM  
 NETFLIX.COM  
 PAYPAL.COM  
 XFINITY.COM  
 FOXNEWS.COM  
 COMCAST.NET  
 TARGET.COM  
 TUMBLR.COM  
 REFERENCE.COM  
 BANKOFAMERICA.COM  
 CNET.COM  
 CHASE.COM  
 ATT.COM  
 ABCNEWS.COM  
 DICTIONARY.COM  
 PINTEREST.COM  
 PANDORA.COM  
 MANTA.COM  
 WEATHERBUG.COM  
 MOZILLA.ORG  
 FOXSPORTS.COM  
 WHITEPAGES.COM  
 WELLSFARGO.COM  
 BESTBUY.COM  
 USATODAY.COM  
 INDEED.COM  
 VERIZONWIRELESS.COM  
 ALLRECIPES.COM  
 PHOTOBUCKET.COM  
 EXPEDIA.COM

WASHINGTONPOST.COM  
 MONSTER.COM  
 DAILYMAIL.CO.UK  
 ZILLOW.COM  
 LATIMES.COM  
 HOMEDEPOT.COM  
 CITYSEARCH.COM  
 INSTAGR.AM  
 SUPERPAGES.COM  
 THEPIRATEBAY.SE  
 ASSOCIATEDCONTENT.COM  
 TRIPADVISOR.COM  
 WEBMD.COM  
 UPS.COM  
 LIVESTRONG.COM  
 MLB.COM  
 FOODNETWORK.COM  
 AVG.COM  
 TICKETMASTER.COM  
 WIKIA.COM  
 BBC.CO.UK  
 LOWES.COM  
 LOCAL.COM  
 CBSLOCAL.COM  
 WSJ.COM  
 NEXTAG.COM  
 SEARS.COM  
 CAPITALONE.COM  
 CAREERBUILDER.COM  
 TMZ.COM  
 FORBES.COM  
 SQUIDOO.COM  
 VIMEO.COM  
 PEOPLE.COM  
 GROUPON.COM  
 POGO.COM  
 HUBPAGES.COM  
 TRULIA.COM  
 DAILYMOTION.COM  
 CBSNEWS.COM  
 USPS.COM  
 PATCH.COM  
 MACYS.COM  
 BABYLON.COM  
 CHACHA.COM  
 LEGACY.COM  
 ETSY.COM  
 NIH.GOV  
 TALEO.NET  
 CNNMONEY.COM  
 FANDANGO.COM  
 DEVIANTART.COM  
 PRICELINE.COM  
 MYLIFE.COM  
 MAYOCLINIC.COM  
 REALTOR.COM  
 MEVIO.COM  
 DISCOVERY.COM  
 FEDEX.COM  
 WIKIHOW.COM  
 THEPOSTGAME.COM  
 MYWEBSEARCH.COM  
 THEFREEDICTIONARY.COM  
 JCPENNEY.COM  
 NYDAILYNEWS.COM  
 BIZRATE.COM



## Website Application and Domain List

EVERYDAYHEALTH.COM	LYCOS.COM	MEDICINENET.COM
TYPEPAD.COM	ED.GOV	CHICAGOTRIBUNE.COM
WUNDERGROUND.COM	BANKRATE.COM	TVGUIDE.COM
EXAMINER.COM	FOOD.COM	PROFLOWERS.COM
FANPOP.COM	FIXYA.COM	COSTCO.COM
HEALTHGRADES.COM	LIFESCRIPT.COM	DELTA.COM
HP.COM	LIVINGSOCIAL.COM	WN.COM
MEDIAFIRE.COM	EW.COM	CONDUIT.COM
YAHOO.CO.UK	THESAURUS.COM	HOTWIRE.COM
SKYPE.COM	YARDBARKER.COM	YOUTUBE-MP3.ORG
HOWSTUFFWORKS.COM	GAP.COM	GAMESPOT.COM
KOHL'S.COM	MOVIEFONE.COM	CSMONITOR.COM
BLEACHERREPORT.COM	CA.GOV	MERCHANTCIRCLE.COM
REUTERS.COM	CBS.COM	SOURCEFORGE.NET
SOUTHWEST.COM	FULLSAIL.EDU	VIDEOBASH.COM
BARNESANDNOBLE.COM	ZAPPOS.COM	THEDAILYBEAST.COM
MTV.COM	GOODREADS.COM	CHEAPOAIR.COM
CITIBANK.COM	4SHARED.COM	UNITED.COM
T-MOBILE.COM	GAMESTOP.COM	PUTLOCKER.COM
TIME.COM	RETAILMENOT.COM	SOFTONIC.COM
EVITE.COM	DAILYFINANCE.COM	EZINEARTICLES.COM
ABC.COM	EONLINE.COM	IMGUR.COM
BUYCHEAPR.COM	USMAGAZINE.COM	MARRIOTT.COM
AUTOTRADER.COM	URBANDICTIONARY.COM	MGID.COM
ORBITZ.COM	HOTELS.COM	VEVO.COM
EBAYSTORES.COM	BABYCENTER.COM	TOSHIBA.COM
SI.COM	SFGATE.COM	PIZZAHUT.COM
NBA.COM	HOMES.COM	BEARSHARE.COM
SYMANTEC.COM	WILDTANGENT.COM	NEWEGG.COM
DELL.COM	ZYNGA.COM	BUSINESSINSIDER.COM
COMCAST.COM	DEXKNOWS.COM	KBB.COM
GUARDIAN.CO.UK	TORRENTZ.EU	ANCESTRY.COM
ZIMBIO.COM	INFO.COM	MICROSOFTONLINE.COM
VERIZON.COM	SHOPZILLA.COM	NJ.COM
AMERICANEXPRESS.COM	ALIBABA.COM	STYLELIST.COM
BUZZFEED.COM	CRACKLE.COM	NBCSPORTS.COM
MERRIAM-WEBSTER.COM	SHOPATHOME.COM	HILTON.COM
SPRINT.COM	SHEKNOWS.COM	CONSTANTCONTACT.COM
GODADDY.COM	CARS.COM	WARNERBROS.COM
URBANSPOON.COM	SOUNDCLOUD.COM	LIVEJOURNAL.COM
METROLYRICS.COM	SPORTINGNEWS.COM	GODVINE.COM
CUSTHELP.COM	IRS.GOV	GARDENWEB.COM
DRUGS.COM	CNBC.COM	ROTTENTOMATOES.COM
CITY-DATA.COM	WALGREENS.COM	MARKETWATCH.COM
AZLYRICS.COM	BOSTON.COM	NORDSTROM.COM
FILESTUBE.COM	NYPOST.COM	THEFIND.COM
MICROSOFTTRANSLATOR.COM	CLASSMATES.COM	WEEBLY.COM
YELLOWBOOK.COM	BUSINESSWEEK.COM	ISOHUNT.COM
IGN.COM	TOPIX.COM	TOYSRUS.COM
NBC.COM	ROADRUNNER.COM	EDMUNDS.COM
REAL.COM	COOKS.COM	BUZZLE.COM
INBOX.COM	PBS.ORG	VICTORIASSECRET.COM
ACCUWEATHER.COM	SHUTTERFLY.COM	COOLMATH-GAMES.COM
NATIONALGEOGRAPHIC.COM	KMART.COM	WIRED.COM
ANSWERS.COM	STAPLES.COM	CRACKED.COM
KAYAK.COM	COUPONS.COM	ADDICTINGGAMES.COM
CAFEMOM.COM	XFINITYTV.COM	BEAUTYOTHEWEB.COM
WEBS.COM	INTELIUS.COM	SAMSCLUB.COM
OVERSTOCK.COM	JAVA.COM	OLDNAVY.COM
SEARCH-RESULTS.COM	PRONTO.COM	WORLDSTARHIPHOP.COM
JUSTANSWER.COM	ZAP2IT.COM	AA.COM
DIRECTV.COM	DISCOVERCARD.COM	USNEWS.COM
INTUIT.COM	SLATE.COM	WISEGEEK.COM
KAT.PH	ZAZZLE.COM	METACAFE.COM
BREAK.COM	USA.GOV	CBSSPORTS.COM
BLOOMBERG.COM	TRAVELOCITY.COM	GIZMODO.COM

## Website Application and Domain List

SNAGAJOB.COM	NICK.COM	DOCSTOC.COM
BODYBUILDING.COM	MATCH.COM	KING.COM
ATT.NET	STATE.TX.US	CENTURYLINK.COM
NFL.COM	BIZJOURNALS.COM	PCH.COM
IMESH.COM	COX.NET	OOVOO.COM
RADIO.COM	EDUCATIONCONNECTION.COM	ANSWERBAG.COM
HISTORY.COM	HOLLYWOODREPORTER.COM	UTORRENT.COM
AARP.ORG	YAHOO.CA	THEBLAZE.COM
DRUDGEREPORT.COM	MEDHELP.ORG	THEATLANTIC.COM
REDBOX.COM	BABBLE.COM	SBINATION.COM
XBOX.COM	MEFEEDIA.COM	COMEDYCENTRAL.COM
HGTV.COM	TWITPIC.COM	INSTANTCHECKMATE.COM
SIMPLYHIRED.COM	MINICLIP.COM	BBB.ORG
REDDIT.COM	PCMAG.COM	NY.GOV
GRINDTV.COM	CAFEPRESS.COM	STATEFARM.COM
CELEBRITY-GOSSIP.NET	HSBCCREDITCARD.COM	CELEBUZZ.COM
IHEART.COM	SUITE101.COM	MACRUMORS.COM
SHOPPING.COM	US.COM	DOUBLEDOWNCASINO.COM
PCWORLD.COM	FILMANNEX.COM	ICIMS.COM
CHARTER.NET	SSA.GOV	ENOTES.COM
SPARKNOTES.COM	RIVALGAMING.COM	PEEKYOU.COM
SEARCHCOMPLETION.COM	RAPIDSHARE.COM	ANGIESLIST.COM
ENGADGET.COM	NPR.ORG	JOB.COM
COLLEGEHUMOR.COM	IVILLAGE.COM	SMARTER.COM
CITI.COM	PNC.COM	PETFINDER.COM
BUY.COM	POLITICO.COM	WWE.COM
DROPBOX.COM	CRAVEONLINE.COM	MARTHASTEWART.COM
NIKE.COM	BEDBATHANDBEYOND.COM	TV.COM
IMINENT.COM	1CHANNEL.CH	AUTOBLOG.COM
NEWSMAX.COM	WETPAINT.COM	GROOVESHARK.COM
PEOPLEFINDERS.COM	TOMSHARDWARE.COM	CDC.GOV
ZBIDDY.COM	FAMILYBUILDER.COM	AUTOZONE.COM
ADP.COM	BOOKING.COM	NASA.GOV
GEICO.COM	WIMP.COM	STYLEBISTRO.COM
TELEGRAPH.CO.UK	NOVAMOV.COM	MIAMIHERALD.COM
DISH.COM	CHOW.COM	DIYFASHION.COM
MASHABLE.COM	OODLE.COM	ACTIVE.COM
LAST.FM	TECHCRUNCH.COM	NYMAG.COM
STUBHUB.COM	GLASSDOOR.COM	BEEMP3.COM
VISTAPRINT.COM	DAILYRX.COM	CARTOONNETWORK.COM
DELISH.COM	ROLLINGSTONE.COM	MYYEARBOOK.COM
GAWKER.COM	FOREVER21.COM	FIDELITY.COM
POLYVORE.COM	FUNNYORDIE.COM	AJC.COM
OFFICEDEPOT.COM	ALWAYSDOWNLOADS.COM	SPARKPEOPLE.COM
SCOUT.COM	THECHIVE.COM	WASHINGTONTIMES.COM
LIFEHACKER.COM	FOXBUSINESS.COM	EPRIZE.NET
ASKMEN.COM	THESTREET.COM	OPM.GOV
WEBCRAWLER.COM	BIBLEGATEWAY.COM	SAMSUNG.COM
CHRON.COM	PROGRESSIVE.COM	HERDAILY.COM
BRASSRING.COM	SHUTTERSTOCK.COM	APARTMENTS.COM
BHG.COM	BIGFISHGAMES.COM	USAA.COM
MCAFEE.COM	FOX.COM	GIFTS.COM
HARK.COM	SODAHEAD.COM	WEATHER.GOV
USBANK.COM	MP3SKULL.COM	FORD.COM
BRAINYQUOTE.COM	LYRICSFREAK.COM	CLASSESUSA.COM
STUMBLEUPON.COM	TASTEOFHOME.COM	LYRICSMODE.COM
CVS.COM	YAHOO.COM.AU	AMERICANIDOL.COM
PEOPLESMAART.COM	SONY.COM	UNIVISION.COM
ELYRICS.NET	IBTIMES.COM	INVESTOPEDIA.COM
INSTRUCTABLES.COM	SLIDESHARE.NET	LOWERMYBILLS.COM
PBSKIDS.ORG	QVC.COM	MYRECIPES.COM
GAMEFAQS.COM	DATPIFF.COM	TIGERDIRECT.COM
LIVENATION.COM	JACKHENRY.COM	VITALS.COM
TIMEANDDATE.COM	QUICKMEME.COM	AZCENTRAL.COM
POF.COM	SEEKINGALPHA.COM	ARMORGAMES.COM
DOMINOS.COM	NEWGROUNDS.COM	STATE.GOV

## Website Application and Domain List

NOAA.GOV  
 BACKPAGE.COM  
 PAPAJOHNS.COM  
 FLIXSTER.COM  
 SUNTIMES.COM  
 NASCAR.COM  
 HOLLYWOODLIFE.COM  
 INFORMER.COM  
 TIMEWARNERCABLE.COM  
 STEAMPOWERED.COM  
 SCIENCEDAILY.COM  
 YAHOO.CO.KR  
 SPOTIFY.COM  
 IKEA.COM  
 SENDORI.COM  
 FINECOMB.COM  
 QUIZLET.COM  
 RADARONLINE.COM  
 BLOCKBUSTER.COM  
 BILLBOARD.COM  
 SOCKSHARE.COM  
 COLLEGEBOARD.COM  
 JETBLUE.COM  
 WIX.COM  
 WOMENSHEALTHBASE.COM  
 APARTMENTGUIDE.COM  
 INSIDERPAGES.COM  
 HLNTV.COM  
 USSEARCH.COM  
 EBAUMSWORLD.COM  
 GOSSIPCENTER.COM  
 BIGLOTS.COM  
 DOCTOROZ.COM  
 BETTYCROCKER.COM  
 SEATTLETIMES.COM  
 DRUGSTORE.COM  
 FUNBRAIN.COM  
 APPLY2JOBS.COM  
 PHILLY.COM  
 ANDERSONCOOPER.COM  
 WEBEX.COM  
 NHL.COM  
 DIGG.COM  
 SWAGBUCKS.COM  
 BLACKBOARD.COM  
 IO9.COM  
 PARENTS.COM  
 EDUCATION.COM  
 RIVALS.COM  
 CHINAFLIX.COM  
 NICKJR.COM  
 RATEMYPROFESSORS.COM  
 SIMPLYRECIPES.COM  
 BOSTONHERALD.COM  
 ULTIMATE-GUITAR.COM  
 DEPOSITFILES.COM  
 EASYBIB.COM  
 MENSHEALTH.COM  
 FINDTHERIGHTJOB.COM  
 USAJOBS.GOV  
 MAKEUSEOF.COM  
 EPINIONS.COM  
 PEREZHILTON.COM  
 SOFTPEDIA.COM  
 BIOGRAPHY.COM  
 MILITARY.COM

JEZEBEL.COM  
 HOLLYWIRE.COM  
 123RF.COM  
 USTREAM.TV  
 HOLLYSCOOP.COM  
 SCHOOLFEED.COM  
 WEHEARTIT.COM  
 SMUGMUG.COM  
 MLIVE.COM  
 JUSTFAB.COM  
 AE.COM  
 MOTORTREND.COM  
 ARCHIVE.ORG  
 TOPTENREVIEWS.COM  
 BLEKKO.COM  
 BARACKOBAMA.COM  
 MILB.COM  
 MICHAELS.COM  
 MEMEBASE.COM  
 METROPOLIS.COM  
 EPICURIOUS.COM  
 INQUISITR.COM  
 LOVETOKNOW.COM  
 ASKMEFAST.COM  
 JUSTJARED.COM  
 ITT-TECH.EDU  
 FUNNYJUNK.COM  
 Y8.COM  
 SHARECARE.COM  
 INFOPLEASE.COM  
 SERVICEMAGIC.COM  
 POPTRIPICA.COM  
 METAFILTER.COM  
 INTELLICAST.COM  
 GREATSCHOOLS.ORG  
 THIRDDAGE.COM  
 DIGITALTRENDS.COM  
 PURDUE.EDU  
 PRICEGRABBER.COM  
 GSN.COM  
 SOFT32.COM  
 TRAVELZOO.COM  
 UNCOVERTHENET.COM  
 COMENITY.NET  
 HEALTHCENTRAL.COM  
 YFROG.COM  
 DMV.ORG  
 BLOGTALKRADIO.COM  
 BESO.COM  
 BOOKINGBUDDY.COM  
 BHPHOTOVIDEO.COM  
 EDLINE.NET  
 LONELYPLANET.COM  
 HEAVY.COM  
 BALTIMORESUN.COM  
 WIKISPACES.COM  
 JOBSONLINE.NET  
 PLAYBOY.COM  
 CABELAS.COM  
 HONDA.COM  
 FAMOUSFOOTWEAR.COM  
 SNOPE.COM  
 PARENTSCONNECT.COM  
 AMTRAK.COM  
 MOVIE TICKETS.COM  
 STEADYHEALTH.COM

NPS.GOV  
 ENTERPRISE.COM  
 FORRENT.COM  
 DENVERPOST.COM  
 KRAFTRECIPES.COM  
 BLACKPLANET.COM  
 HULKSHARE.COM  
 BET.COM  
 HSN.COM  
 YAHOO.CO.IN  
 FITNESSMAGAZINE.COM  
 EBAYCLASSIFIEDS.COM  
 MCDONALDS.COM  
 SHOPWIKI.COM  
 GOVERNMENTJOBS.COM  
 MYFITNESSPAL.COM  
 IZITO.COM  
 GOGECAPITAL.COM  
 ORLANDOSENTINEL.COM  
 SNAPFISH.COM  
 PAWNATION.COM  
 CHEAPTICKETS.COM  
 DICKSSPORTINGGOODS.COM  
 DIRECTORSLIVE.COM  
 EMEDICINEHEALTH.COM  
 SIDEREEL.COM  
 DOITYOURSELF.COM  
 MOVIEROOMREVIEWS.COM  
 IAMCATWALK.COM  
 THEHOLLYWOODGOSSIP.COM  
 RHAPSODY.COM  
 REALSIMPLE.COM  
 HEALTHBOARDS.COM  
 RANKINGSANDREVIEWS.COM  
 CHANGE.ORG  
 YAHOO.COM.CN  
 GIRLSGOGAMES.COM  
 LYRICS007.COM  
 CHEATCC.COM  
 KIDSHEALTH.ORG  
 GRAINGER.COM  
 FREECAUSE.COM  
 MERCURYNEWS.COM  
 PROBOARDS.COM  
 REVERBNATION.COM  
 GLAM.COM  
 RENT.COM  
 COOLMATH.COM  
 WAJAM.COM  
 SCHOLASTIC.COM  
 IMVU.COM  
 FOOL.COM  
 SUBWAY.COM  
 EVENTBRITE.COM  
 MEETUP.COM  
 ICHOTELSGROUP.COM  
 SEEKYSEARCH.NET  
 KRONOSTM.COM  
 CONSUMERSEARCH.COM  
 STATE.PA.US  
 CELEBSPIN.COM  
 WORDREFERENCE.COM  
 PHOENIX.EDU  
 MARVEL.COM  
 YOUSENDIT.COM  
 CLASSIFIEDADS.COM

## Website Application and Domain List

GAMEFLY.COM  
 CALLOFDUTY.COM  
 LEAGUEOFLEGENDS.COM  
 BADOO.COM  
 PSYCHOLOGYTODAY.COM  
 RADIOSHACK.COM  
 ARCHIVES.COM  
 JOBS-TO-CAREERS.COM  
 BOOSTMOBILE.COM  
 OPRAH.COM  
 VRBO.COM  
 ZDNET.COM  
 KONGREGATE.COM  
 JEST.COM  
 LIVESCIENCE.COM  
 STARPULSE.COM  
 HUFFINGTONPOST.CO.UK  
 UCOMPAREHEALTHCARE.COM  
 KOTAKU.COM  
 JUSTIN.TV  
 DIYNETWORK.COM  
 BLACKBERRY.COM  
 KNOWYOURMEME.COM  
 CALIBEX.COM  
 THINKEXIST.COM  
 VH1.COM  
 LEAWO.COM  
 STACKOVERFLOW.COM  
 AL.COM  
 FAILBLOG.ORG  
 WOOT.COM  
 USDA.GOV  
 VIDEO2MP3.NET  
 FANFICTION.NET  
 WIZARD101.COM  
 BLIZZARD.COM  
 CHRISTIANPOST.COM  
 THEKNOT.COM  
 HRSACCOUNT.COM  
 SEATTLEPI.COM  
 MEGAUPLOAD.COM  
 K12.CA.US  
 ORIENTALTRADING.COM  
 LOCALBUZZ.US  
 LOCKERZ.COM  
 TAGGED.COM  
 DEEDORGREED.COM  
 TED.COM  
 DAMNLOL.COM  
 ZULILY.COM  
 OVGUIDE.COM  
 CARMAX.COM  
 WEBPRONWS.COM  
 WEIGHTWATCHERS.COM  
 CITRIXONLINE.COM  
 THINKQUEST.ORG  
 OPERA.COM  
 USCIS.GOV  
 INDIATIMES.COM  
 FINGERHUT.COM  
 FREEP.COM  
 OURSTAGE.COM  
 SALARY.COM  
 TELEVISIONFANATIC.COM  
 ORCHARDBANK.COM  
 AAA.COM

HOWTOGEEK.COM  
 HOMESTEAD.COM  
 SPINNER.COM  
 INDEPENDENT.CO.UK  
 CLEVELAND.COM  
 MADEMAN.COM  
 PIXLR.COM  
 STANFORD.EDU  
 SALON.COM  
 STARTRIBUNE.COM  
 CHARTER.COM  
 NADAGUIDES.COM  
 CWTVC.COM  
 SOMEECARDS.COM  
 SALLIEMAE.COM  
 6PM.COM  
 LOOPNET.COM  
 STATE.FL.US  
 OFFICEMAX.COM  
 PAYLESS.COM  
 1-800-FLOWERS.COM  
 DIGITALRIVER.COM  
 STATE.NJ.US  
 OREGONLIVE.COM  
 PRODUTOOLS.COM  
 CORNELL.EDU  
 WISEDOWNLOADS.COM  
 SGSAPPS.COM  
 GAMES.COM  
 FINDLAW.COM  
 AMAZON.CO.UK  
 FOURSQUARE.COM  
 TORRENTREACTOR.NET  
 V2CIGS.COM  
 LISTAL.COM  
 VA.GOV  
 PARTYCITY.COM  
 FOXSPORTSSOUTHWEST.COM  
 FORCE.COM  
 TOYOTA.COM  
 SOCIALSECURITYDISABILITYBENEFITS.CO

COX.COM  
 DAILYCALLER.COM  
 SPACE.COM  
 ROBLOX.COM  
 SUNTRUST.COM  
 ADVANCEAUTOPARTS.COM  
 FAB.COM  
 MANDATORY.COM  
 AMCTHEATRES.COM  
 CONSUMERREPORTS.ORG  
 DEADSPIN.COM  
 ONETRAVEL.COM  
 ECOLLEGE.COM  
 NING.COM  
 WHERE2GETIT.COM  
 PETCO.COM  
 GAMETRAILERS.COM  
 LYRICSMANIA.COM  
 KICKSTARTER.COM  
 CARGURUS.COM  
 CDUNIVERSE.COM  
 VIDXDEN.COM  
 GATHER.COM  
 MYCRICKET.COM

IFOOD.TV  
 DEALSP.LUS  
 KABOODLE.COM  
 EHEALTHFORUM.COM  
 CHOICEHOTELS.COM  
 EBAY.CO.UK  
 COSMOPOLITAN.COM  
 TICKETS.COM  
 EMEDTV.COM  
 MYWEBGROCER.COM  
 CARE2.COM  
 MEDIATAKEOUT.COM  
 WTHR.COM  
 LEGO.COM  
 USAIRWAYS.COM  
 PASTEBIN.COM  
 MYSTART.COM  
 YIDIO.COM  
 MEDSCAPE.COM  
 SOLARMOVIE.EU  
 REDFIN.COM  
 ARMY.MIL  
 AP.ORG  
 RENTALS.COM  
 AUTOPARTSWAREHOUSE.COM  
 GORILLALEAK.COM  
 ISSUU.COM  
 STARSJOURNAL.COM  
 SLICKDEALS.NET  
 RAPIDLIBRARY.COM  
 DSWSHOES.COM  
 FTD.COM  
 OPENTABLE.COM  
 MYCOKEREWARDS.COM  
 HARBORFREIGHT.COM  
 PLAYLIST.COM  
 STACKEXCHANGE.COM  
 REALCLEARPOLITICS.COM  
 MODEL MAYHEM.COM  
 BIGCARTEL.COM  
 GRANTLAND.COM  
 CREDITREPORT.COM  
 TOLUNA.COM  
 REDBALCONY.COM  
 PLAYSTATION.COM  
 OMEGLE.COM  
 WA.GOV  
 PGATOUR.COM  
 ACROBAT.COM  
 MICHIGAN.GOV  
 HARVARD.EDU  
 FREESCORE360.COM  
 AIRTRAN.COM  
 ALIEXPRESS.COM  
 IPLAY.COM  
 ICANHASCHEEZBURGER.COM  
 HOLLYWOOD.COM  
 GOTOMEETING.COM  
 DEADLINE.COM  
 SCIENCEDIRECT.COM  
 APARTMENTRATINGS.COM  
 NEOSEEKER.COM  
 WOMENSFORUM.COM  
 BOOKIT.COM  
 TOTALBEAUTY.COM  
 PETSMART.COM

## Website Application and Domain List

STEAMCOMMUNITY.COM	MAPS4PC.COM	DAVIDSBRIDAL.COM
REGIONS.COM	VIRGINMOBILEUSA.COM	THEVERGE.COM
CHEVROLET.COM	KROGER.COM	WEDDINGCHANNEL.COM
123GREETINGS.COM	SHOPLOCAL.COM	HEALTHGURU.COM
IN.COM	URBANOUTFITTERS.COM	INBOXDOLLARS.COM
FRONTIER.COM	CARSDIRECT.COM	SALESFORCE.COM
SACBEE.COM	CISCO.COM	ETEAAMZ.COM
JOYSTIQ.COM	POST-GAZETTE.COM	SPIKE.COM
WHATTOEXPECT.COM	TUNEIN.COM	FAMILY.COM
DILLARDS.COM	TOTALJERKFACE.COM	IWIN.COM
BRITANNICA.COM	MAXPREPS.COM	FRYS.COM
CORTERA.COM	CONVIO.COM	SPEEDPAY.COM
EATINGWELL.COM	THEGLOBEANDMAIL.COM	HYUNDAIUSA.COM
STARBUCKS.COM	HOTPADS.COM	VIDEOSURF.COM
AMCTV.COM	HOMEAWAY.COM	MENARDS.COM
EXPERIENCEPROJECT.COM	SHOPAUTOWEEK.COM	BIBLE.CC
QUALITYHEALTH.COM	WALMARTMONEYCARD.COM	PILLSBURY.COM
SPANISHDICTIONARY.COM	AMERICANTOWNS.COM	ALLSTATE.COM
SONGMEANINGS.NET	IEGALLERY.COM	PICNIK.COM
SING365.COM	FINISHLINE.COM	MCGRAW-HILL.COM
CARFAX.COM	SELF.COM	SPRINTPCS.COM
AGAME.COM	COMPLEX.COM	PSU.EDU
CHEGG.COM	NOLA.COM	EHARMONY.COM
BEESQ.NET	READERSDIGEST.COM	APARTMENTFINDER.COM
MAPSGALAXY.COM	WORLDATLAS.COM	YAHOO.COM.MX
THEBOOMBOX.COM	ZOOSK.COM	PASSPORT.COM
OPTIMUM.NET	CHEAPFLIGHTS.COM	DUMMIES.COM
NEWYORKER.COM	SHOCKWAVE.COM	SIRIUSXM.COM
G4TV.COM	STORIFY.COM	HODESIQ.COM
LOGMEIN.COM	THEONION.COM	TOOFAB.COM
TDBANK.COM	FINDTHEBEST.COM	WATCHCARTOONONLINE.COM
NEWSDAY.COM	MYFUNCARDS.COM	TRANSLATEYE.COM
SHOPSTYLE.COM	UPROXX.COM	CMT.COM
VERIZON.NET	HOLLISTERCO.COM	INCREDIBAR.COM
TECHREPUBLIC.COM	THEHILL.COM	SMARTMONEY.COM
AMERICANGREETINGS.COM	RAPGENIUS.COM	BOINGBOING.NET
CORPORATIONWIKI.COM	PRIMARYGAMES.COM	HOMETOWNLOCATOR.COM
BROTHERSOFT.COM	ME.COM	WEEKLYSTANDARD.COM
NEXON.NET	BRAVOTV.COM	REMAX.COM
ONLINE-REFERENCE-TOOLS.COM	GLAMOUR.COM	NEXTSPORTSTAR.COM
MIRROR.CO.UK	GETGLUE.COM	POPCAP.COM
UPTAKE.COM	MYNEWPLACE.COM	VIRTUALLYTHERE.COM
BITBERRYUPDATES.COM	LANDSEND.COM	TINYPIC.COM
WIKTIONARY.ORG	COEDMAGAZINE.COM	THEOATMEAL.COM
WASHINGTONEXAMINER.COM	EASTBAY.COM	BBT.COM
NYC.GOV	JSONLINE.COM	BASSPRO.COM
MYFLORIDA.COM	INGDIRECT.COM	QUORA.COM
SCRIBD.COM	PUBLICRECORDS.COM	SILKROAD.COM
GUITARCENTER.COM	BERKELEY.EDU	ONSUGAR.COM
REI.COM	SUN-SENTINEL.COM	HRDEPARTMENT.COM
EA.COM	YELLOWNOW.COM	HEALTH.COM
CLUBPENGUIN.COM	POEMHUNTER.COM	BRADSDEALS.COM
ANDROIDFORUMS.COM	LIVESTREAM.COM	MP3RAID.COM
SEPHORA.COM	EXPRESS.COM	YAHOO.ES
DOWNLOAD-NATION.COM	SPORTSAUTHORITY.COM	OKCUPID.COM
FILECROP.COM	BOSSIP.COM	DREAMSTIME.COM
BANDCAMP.COM	MYDISH.COM	CBC.CA
ALOT.COM	EQUIFAX.COM	ISSOLUTIONS.INFO
POPULARMECHANICS.COM	INC.COM	COUPONALERT.COM
BUFFALO-GGN.NET	CARSFORSALE.COM	EVILCHILI.COM
THERUGGED.COM	IOFFER.COM	SERIOUSEATS.COM
WILEY.COM	SIXFLAGS.COM	BATHANDBODYWORKS.COM
HBO.COM	800NOTES.COM	CONVERGENTCARE.COM
HUFFINGTONPOST.CA	WAYFAIR.COM	ADSUPPLY.COM
GOOGLE.CA	BAIDU.COM	FASTCOMPANY.COM
FOOTLOCKER.COM	CARNIVAL.COM	LISTVERSE.COM

## Website Application and Domain List

ESSORTMENT.COM	HM.COM	MO.GOV
JANGO.COM	GOODHOUSEKEEPING.COM	TORRENTCRAZY.COM
CARE.COM	AEROPOSTALE.COM	FOTOSEARCH.COM
SCOTTRADE.COM	STRAIGHTDOPE.COM	TRAILS.COM
PCPOWERSPEED.COM	IXL.COM	MODCLOTH.COM
DISCOVERBING.COM	MOMTASTIC.COM	NETSUITE.COM
WINZIP.COM	BOXOFFICEMOJO.COM	BLISS.COM
CONTACTMUSIC.COM	STYLEBLAZER.COM	DOMAINTOOLS.COM
SURVEYGIZMO.COM	FLICKRIVER.COM	NORTHERNTOOL.COM
WHOSAY.COM	BYINTER.NET	YOURDICTIONARY.COM
MYLIFETIME.COM	5MIN.COM	BEST-DEAL.COM
MYPOINTS.COM	FOXSPORTSWEST.COM	MNN.COM
PARENTING.COM	IN.GOV	MANGAHERE.COM
CARANDDRIVER.COM	YOURAVON.COM	YOURTANGO.COM
IMOTORS.COM	GOOGLE.CO.UK	PRNEWswire.COM
HOTTOPIC.COM	ZENDESK.COM	ASK.CO.UK
SHMOOP.COM	MAXIM.COM	BLUESHELLGAMES.COM
EVENTFUL.COM	RAPIDGATOR.NET	FODORS.COM
MICROSOFTSTORE.COM	RESTAURANT.COM	HERTZ.COM
MINECRAFT.NET	4CHAN.ORG	TRUTV.COM
MIT.EDU	MACWORLD.COM	CENTURY21.COM
INSTAGRAM.COM	GOODCHOLESTEROLCOUNT.COM	WHOSDATEDWHO.COM
FREECREDITSCORE.COM	53.COM	MENSHEALTHBASE.COM
QUICKBOOKS.COM	BUYATOYOTA.COM	FORMSPRING.ME
GOOGLE.NL	COLLEGECONFIDENTIAL.COM	FIRSTTOWSPORTS.EU
SONGLYRICS.COM	JOBRAPIDO.COM	IWANNAWATCH.NET
HTC.COM	ECONOMIST.COM	BILLMELATER.COM
RIGHTDIAGNOSIS.COM	WORLDWINNER.COM	TNTDRAMA.COM
UHAUL.COM	THEKITCHN.COM	MEIJER.COM
GOFREE.COM	BLASTRO.COM	LIFE123.COM
BECOME.COM	SCREENRANT.COM	WASHINGTON.EDU
SEARCHQUOTES.COM	JOANN.COM	TIRERACK.COM
BLINKX.COM	BLS.GOV	OLX.COM
CINEMABLEND.COM	WALMARTSTORES.COM	KSL.COM
ENCYCLOPEDIA.COM	GREENDOT.COM	FILEBOX.COM
POTTERYBARN.COM	THEFRISKY.COM	FILE.ORG
AVAST.COM	LENOVO.COM	ESPNSOCCERNET.COM
FANNATION.COM	KAISERPERMANENTE.ORG	FINDAGRAVE.COM
POPSUGAR.COM	411.COM	THINKGEEK.COM
TECHRADAR.COM	UBI.COM	WEDDINGWIRE.COM
TIMESUNION.COM	OREILLYAUTO.COM	VERTITECHNOLOGYGROUP.COM
VIRGINIA.GOV	VICE.COM	CUNY.EDU
50STATES.COM	BRIGHTHUB.COM	AREACONNECT.COM
TINYCHAT.COM	EVONY.COM	THEROOT.COM
MOMMYMIXING.COM	PCHGAMES.COM	THEBOOT.COM
STRAIGHTTALK.COM	PIPL.COM	HILLSHIREFARM.COM
RUNNERSWORLD.COM	BOOKRAGS.COM	ELLE.COM
TARINGA.NET	GAMINGWONDERLAND.COM	PREVENTION.COM
AVVO.COM	HOLIDAYINN.COM	MONEYNEWS.COM
ZOCDOC.COM	UTEXAS.EDU	SHOEDAZZLE.COM
FINDARTICLES.COM	BLOCKSHOPPER.COM	NASDAQ.COM
FOXSPORTSFLORIDA.COM	DAILYGLOW.COM	REALAGE.COM
JSTOR.ORG	YUKU.COM	WORTHPOINT.COM
DALLASNEWS.COM	NCAA.COM	ORACLE.COM
THESUN.CO.UK	RANKER.COM	PEOPLEPETS.COM
CREDITKARMA.COM	LUMOSITY.COM	FUNDSPRESS.COM
WND.COM	BOARDREADER.COM	DETNEWS.COM
QUOTEGARDEN.COM	TWITCH.TV	WEDDINGBEE.COM
TOTALREWARDS.COM	SQUARESPACE.COM	WIREFLY.COM
THEWORKBUZZ.COM	SOUTHPARKSTUDIOS.COM	WAHOHA.COM
ESQUIRE.COM	GAMEHOUSE.COM	MUSICIANSFRIEND.COM
1-800-THERAPIST.COM	NCHSOFTWARE.COM	RESERVEAMERICA.COM
GREYHOUND.COM	ENTREPRENEUR.COM	ALLY.COM
TURNITIN.COM	MYPODSTUDIOS.COM	LOCALPAGES.COM
DIRECTLYRICS.COM	INSTYLE.COM	ACCESSHOLLYWOOD.COM
VANITYFAIR.COM	USGS.GOV	TORRENTHOUND.COM

## Website Application and Domain List

CHRISTIANBOOK.COM	TDAMERITRADE.COM	TVTROPES.ORG
AETNA.COM	HYATT.COM	QUIZNOS.COM
MAPSOFWORLD.COM	BASEBALL-REFERENCE.COM	FILESERVE.COM
VIDBUX.COM	LOC.GOV	HOTNEWHIPHOP.COM
HOBBYLOBBY.COM	CONTENKO.COM	SAVINGSTAR.COM
ALLMENUS.COM	EXPERIAN.COM	TRYSENSA.COM
JALOPNIK.COM	MENTALFLOSS.COM	MINECRAFTFORUM.NET
MANGAREADER.NET	WIKIMEDIAFOUNDATION.ORG	NETDOCTOR.CO.UK
ALTERNET.ORG	IHOTELIER.COM	CALOTTERY.COM
MOVIES.COM	BANANAREPUBLIC.COM	BLOOMINGDALES.COM
YUMMLY.COM	FARK.COM	BOATTRADER.COM
THEDAILYSHOW.COM	MATHXL.COM	HEALTHLINE.COM
AIM.COM	NEWSBUSTERS.ORG	STATE.IL.US
DHGATE.COM	QUESTBASIC.COM	JCWHITNEY.COM
ACER.COM	CITIZENSBANK.COM	CHILDRENSPLACE.COM
PICMONKEY.COM	MYVIEW.COM	THESUPERFICIAL.COM
YAKAZ.COM	WISC.EDU	CHARLOTTEOBSERVER.COM
BLOGSPOT.CA	GMC.COM	PANORAMIO.COM
THESMOKINGGUN.COM	SWITCHBOARD.COM	ADDICTIVETIPS.COM
HELIUM.COM	ECRATER.COM	SMARTSOURCE.COM
THISOLDHOUSE.COM	COACH.COM	SENDSPACE.COM
COLLIDER.COM	CITICARDS.COM	SEAWORLDPARKS.COM
BEHANCE.NET	CANON.COM	LIVELEAK.COM
ZIPPYSHARE.COM	UMN.EDU	SEARSPARTSDIRECT.COM
MENUPAGES.COM	COOKINGLIGHT.COM	MYPYPCBACKUP.COM
THEATLANTICWIRE.COM	ISTOCKPHOTO.COM	MATHSISFUN.COM
METRIC-CONVERSIONS.ORG	ACESHOWBIZ.COM	TELEFLORA.COM
WHITEHOUSE.GOV	WATCHSERIES.EU	NISSANUSA.COM
PRWEB.COM	HALLMARK.COM	EDUCATIONASSISTANCE.ORG
SYMPTOMFIND.COM	RUNESCAPE.COM	CCBILL.COM
NAVYFCU.ORG	CARDOMAIN.COM	ASKMEHELPDESK.COM
PEOPLECLICK.COM	WNLOADS.NET	STARDOLL.COM
MORNINGSTAR.COM	FOODANDWINE.COM	VIDEOFRAG.COM
LDS.ORG	COLUMBIA.EDU	MANAGEYOURLOANS.COM
BREITBART.COM	ACEHARDWARE.COM	MYSANANTONIO.COM
HHS.GOV	CIRCLEOFMOMS.COM	DEALTIME.COM
GADLING.COM	SMARTERLIFESTYLES.COM	WFAA.COM
GLOBALGRIND.COM	HYPSTER.COM	BOX.COM
TVFANATIC.COM	MEGAMILLIONS.COM	THECARCONNECTION.COM
ICLOUD.COM	ARSTECHNICA.COM	NOMORERACK.COM
CHEEZBURGER.COM	ILLINOIS.EDU	BKSTR.COM
EARTHLINK.NET	WELHABITS.COM	RECIPE.COM
ADULTSWIM.COM	IWASTESOMUCHTIME.COM	FREESHIPPING.COM
WUFOO.COM	TURBOTAX.COM	VIDEOWEED.ES
BESTWESTERN.COM	WINDOWSMEDIA.COM	MAHALO.COM
FREEONLINEGAMES.COM	ALASKAAIRLINES.COM	AVON.COM
CREDITONEBANK.COM	FUELECONOMY.GOV	PRODUCTMADNESS.COM
RXLIST.COM	STATE.NY.US	FOXSPORTSWISCONSIN.COM
OHIO.GOV	INTEL.COM	EMPOWHER.COM
LAWYERS.COM	BILLMATRIX.COM	DAFONT.COM
EGOTASTIC.COM	THEPIONEERWOMAN.COM	HAUTELOOK.COM
NINTENDO.COM	CENTURYLINK.NET	TVLINE.COM
BITSNOOP.COM	CENSUS.GOV	WONDERHOWTO.COM
E-REWARDS.COM	LOCALGUIDES.COM	FT.COM
SHOEBUY.COM	MINECRAFTWIKI.NET	FUNTRIVIA.COM
HOMEFINDER.COM	PALMBEACHPOST.COM	MYSTORE411.COM
GARDENGUIDES.COM	GAMEINFORMER.COM	WINPORTAL.COM
TRAVELCHANNEL.COM	FILESONIC.COM	BUDGET.COM
APARTMENTHOMELIVING.COM	GNC.COM	4SHARED.NET
FATWALLET.COM	ICONTACT.COM	SMARTSHOPPINGINFO.COM
K12.FL.US	SLACKER.COM	COLDWELLBANKER.COM
CARINGBRIDGE.ORG	STLTODAY.COM	SI.EDU
ALLPOSTERS.COM	SAFEWAY.COM	KIZI.COM
CNETTV.COM	MYFRIENDSGREETINGS.COM	GILT.COM
NEIMANMARCUS.COM	SYRACUSE.COM	TURBOBIT.NET
FLALOTTERY.COM	BITRHYMES.COM	GOURMANDIA.COM



## Website Application and Domain List

ABERCROMBIEANDFITCH.COM  
 MRMOVIEIMAGES.COM  
 APPBANK.COM  
 MODERNHOMEMODERNBABY.COM  
 THESIMS3.COM  
 TRANSUNION.COM  
 SMOSH.COM  
 INVESTORS.COM  
 HOOVERS.COM  
 FREEFLYS.COM  
 DREAMJOBBER.COM  
 UMICH.EDU  
 PUBLIX.COM  
 ESPNRADIO.COM  
 HALF.COM  
 DAILYKOS.COM  
 JOBSRADAR.COM  
 DRAGOART.COM  
 PERSONALIZATIONMALL.COM  
 EXPOSAY.COM  
 OVERDRIVE.COM  
 FARMVILLE.COM  
 FINANCIAL-NET.COM  
 UOL.COM.BR  
 ASOS.COM  
 SPORCLE.COM  
 COMPUTERWORLD.COM  
 MUZY.COM  
 1AND1.COM  
 SHAPE.COM  
 WOMENSHEALTHMAG.COM  
 FILEHIPPO.COM  
 UPENN.EDU  
 FROMMERS.COM  
 POSTINI.COM  
 AUDIBLE.COM  
 BARRONS.COM  
 9GAG.COM  
 MENUISM.COM  
 MTA.INFO  
 RESEARCHNOW.COM  
 TOTALRECIPESEARCH.COM  
 IBM.COM  
 VULTURE.COM  
 AVCLUB.COM  
 INTERIORCOMPLEX.COM  
 SINA.COM.CN  
 GOTHAMIST.COM  
 MMO-CHAMPION.COM  
 DOWNLOAD-FREE.COM  
 FILEFACTORY.COM  
 AUTODESK.COM  
 ART.COM  
 PIRIFORM.COM  
 LIGHTINTHEBOX.COM  
 PLAYSUSHI.COM  
 THECELEBRITYCAFE.COM  
 GOLFLINK.COM  
 HGTVREMODELS.COM  
 LANE'BRYANT.COM  
 ANALYRICS.COM  
 XE.COM  
 KEEPVID.COM  
 DOWNLOADS.NL  
 WIKITRAVEL.ORG  
 CAMPUSCORNER.COM

ANDROIDCENTRAL.COM  
 ANGRYBIRDS.COM  
 9NEWS.COM  
 RITEAID.COM  
 JOIN.ME  
 W3SCHOOLS.COM  
 AMERICANPROFILE.COM  
 SIMON.COM  
 ANTHEM.COM  
 SONGKICK.COM  
 GQ.COM  
 YELLOWBOT.COM  
 MOCOSPACE.COM  
 CINEMARK.COM  
 PANERABREAD.COM  
 OLIVEGARDEN.COM  
 NEWSER.COM  
 HIGHBEAM.COM  
 MANGAFOX.ME  
 HBOGO.COM  
 BLOGS.COM  
 NINJAKIWI.COM  
 WOWHEAD.COM  
 PRLOG.ORG  
 SPELLINGCITY.COM  
 WESTERNUNION.COM  
 AESOPONLINE.COM  
 KING5.COM  
 ETRADE.COM  
 LIVEMIXTAPES.COM  
 CNSNEWS.COM  
 PSYCHCENTRAL.COM  
 KODAKGALLERY.COM  
 IFUNNY.MOBI  
 ALLVOICES.COM  
 SCRABBLEFINDER.COM  
 FORLOCATIONS.COM  
 JOBAMATIC.COM  
 STUDENTLOANS.GOV  
 CRATEANDBARREL.COM  
 COREL.COM  
 ULTIRECRUIT.COM  
 AMERICANLISTED.COM  
 YAHOO.COM.SG  
 AUTO-PRICE-FINDER.COM  
 BLOGSPOT.IN  
 CARID.COM  
 DVDVIDEOSOFT.COM  
 COMPUTING.NET  
 TAMPABAY.COM  
 THEGRIQ.COM  
 REDENVELOPE.COM  
 DISCOVERYEUCATION.COM  
 NAVY.MIL  
 TRAVELMATH.COM  
 GOSSIPCP.COM  
 BARSTOOLSPOITS.COM  
 KHANACADEMY.ORG  
 TRAVELANDLEISURE.COM  
 MADE-IN-CHINA.COM  
 EDIBLEARRANGEMENTS.COM  
 UFL.EDU  
 STLYRICS.COM  
 FREESCOREONLINE.COM  
 PEPBOYS.COM  
 DODGE.COM

SEVENFORUMS.COM  
 IREPORT.COM  
 MOMSWHOTHINK.COM  
 XKCD.COM  
 BLUEHOST.COM  
 BJS.COM  
 ANIMEFREAK.TV  
 KUDZU.COM  
 WOMANSDAY.COM  
 BUSTEDCOVERAGE.COM  
 SEVENTEEN.COM  
 MEMECENTER.COM  
 LOLZBOOK.COM  
 AUTOANYTHING.COM  
 HSBC.COM  
 OCREGISTER.COM  
 MADAMENOIRE.COM  
 GROUPRECIPES.COM  
 FTC.GOV  
 COWBOYLRYICS.COM  
 WELLNESS.COM  
 NATIONALPOST.COM  
 LYRICSTIME.COM  
 ADIDAS.COM  
 AMERICANFAMILY.COM  
 EDUCATION-PORTAL.COM  
 APPLES4THETEACHER.COM  
 SCHWAB.COM  
 RALPHLAUREN.COM  
 THEBUMP.COM  
 NESN.COM  
 BLUEMOUNTAIN.COM  
 MULTIPLY.COM  
 REDBUBBLE.COM  
 MEDIAITE.COM  
 NOTDOPPLER.COM  
 WALLSTCHEATSHEET.COM  
 CUSTOMINK.COM  
 METROMIX.COM  
 WAYPORT.NET  
 KANSASCITY.COM  
 JR.COM  
 MYDAILYMOMENT.COM  
 STAR-TELEGRAM.COM  
 SMARTMOMSTYLE.COM  
 NATURE.COM  
 NME.COM  
 AETV.COM  
 MINT.COM  
 ONEKINGSLANE.COM  
 NEWCOUPONSFOR.ME  
 HOTELPLANNER.COM  
 LLBEAN.COM  
 BABIESRUS.COM  
 SENDEARNINGS.COM  
 MAKERS.COM  
 FROSTWIRE.COM  
 GAMES-VILLAGE.COM  
 FREECREDITREPORT.COM  
 MYXER.COM  
 VANGUARD.COM  
 RUSHCARD.COM  
 ARCOT.COM  
 SLASHGEAR.COM  
 AUTHORIZE.NET  
 FAQS.ORG



## Website Application and Domain List

NATIONALJOURNAL.COM  
 THESTAR.COM  
 ZIPREALTY.COM  
 METACRITIC.COM  
 BRADFORDEXCHANGE.COM  
 HEWITT.COM  
 NAVER.COM  
 UPLOADED.TO  
 CHARLOTTERUSSE.COM  
 VIRTUALTOURIST.COM  
 MAGICJACK.COM  
 FLY.COM  
 EPA.GOV  
 ARTICLESBASE.COM  
 TIMEOUT.COM  
 STATE.MI.US  
 3M.COM  
 GIGAOM.COM  
 JOBUNGO.COM  
 RESEARCH.NET  
 PHYSICSFORUMS.COM  
 STATE.MN.US  
 HOUZZ.COM  
 UPICKEM.NET  
 FREEDOWNLOAD.IS  
 MYNEWSLETTERBUILDER.COM  
 STARWOODHOTELS.COM  
 SAVENKEEP.COM  
 LOWFARES.COM  
 AVIS.COM  
 NARUTOGET.COM  
 KELLOGGS.COM  
 FC2.COM  
 UFC.COM  
 ROCKETLAWYER.COM  
 HAMPTON-INN.COM  
 FAVIM.COM  
 AVERY.COM  
 FORVO.COM  
 GARMIN.COM  
 BITSHARE.COM  
 THEWEEK.COM  
 AOLANSWERS.COM  
 CARING.COM  
 PBWORKS.COM  
 TRACTORSUPPLY.COM  
 ORTSBOABC.COM  
 HOODAMATH.COM  
 GOOD.IS  
 TRAVEL-TICKER.COM  
 K12.GA.US  
 TRENDMICRO.COM  
 STARFALL.COM  
 YOUKU.COM  
 GRASSCITY.COM  
 GOOGLE.COM.MX  
 CAMPUSEXPLORER.COM  
 TECHGUY.ORG  
 USCELLULAR.COM  
 KOMONEWS.COM  
 ZMOVIE.TV  
 KARMALOOP.COM  
 TUDOU.COM  
 PROACTIV.COM  
 MEDICALNEWSTODAY.COM  
 OPINIONPLACE.COM

GAMESGAMES.COM  
 HOTFILE.COM  
 COLDWATERCREEK.COM  
 MLXCHANGE.COM  
 ACADEMY.COM  
 REPLY.COM  
 UTAH.GOV  
 VACATIONRENTALS.COM  
 HOTELSONE.COM  
 UPROMISE.COM  
 CRUTCHFIELD.COM  
 NVIDIA.COM  
 PREZI.COM  
 FRIV.COM  
 MAC-FORUMS.COM  
 DPREVIEW.COM  
 SPREADSHIRT.NET  
 BLOGSPOT.CO.UK  
 LOCALHEALTH.COM  
 LOGITECH.COM  
 SLASHDOT.ORG  
 FUPA.COM  
 CYCLETRADER.COM  
 DAVESGARDEN.COM  
 SUPERCHEATS.COM  
 2SHARED.COM  
 GIANTBOMB.COM  
 DRAGONETERNITY.COM  
 SAKSFIFTHAVENUE.COM  
 DOGBREEDINFO.COM  
 KTLA.COM  
 BACKCOUNTRY.COM  
 ALLMUSIC.COM  
 THEFASHIONSPOT.COM  
 TUBEPLUS.ME  
 SPRINGERLINK.COM  
 SHAREBEAST.COM  
 WIKIQUOTE.ORG  
 CONSUMERAUTOSOURCE.COM  
 RELISH.COM  
 HOUSEHOLDBANK.COM  
 KODAK.COM  
 ASUS.COM  
 OSU.EDU  
 ETONLINE.COM  
 MOM.ME  
 WTSP.COM  
 CIGNA.COM  
 THELADDERS.COM  
 FUBAR.COM  
 BORED.COM  
 BITTORRENT.COM  
 OPPAPERS.COM  
 PACSUN.COM  
 VOLUSION.COM  
 PURPLEMATH.COM  
 ANNUALCREDITREPORT.COM  
 DIVINECAROLINE.COM  
 ORON.COM  
 JUSTIA.COM  
 GUYISM.COM  
 ALLEGIANTAIR.COM  
 REGALCINEMAS.COM  
 MYHOMEMSN.COM

FIRESTONECOMPLETEAUTOCARE.COM

SCHOOLLOOP.COM  
 TOMS.COM  
 SOHU.COM  
 COMICBOOKMOVIE.COM  
 COOLMATH4KIDS.COM  
 YOLASITE.COM  
 ULTA.COM  
 DISCOVERMAGAZINE.COM  
 SOUTHERNLIVING.COM  
 VENTUREBEAT.COM  
 BERRIES.COM  
 STATE.MD.US  
 INDYSTAR.COM  
 PHONEARENA.COM  
 CHATROULETTE.COM  
 YARDESELLR.COM  
 WIKIMEDIA.ORG  
 IAPPLICANTS.COM  
 ATTRAKT.COM  
 BELK.COM  
 NATURALNEWS.COM  
 ESSENCE.COM  
 TBO.COM  
 AVS4YOU.COM  
 LIJIT.COM  
 MYFOXNY.COM  
 MANUALSONLINE.COM  
 PENNY-ARCADE.COM  
 VONAGE.COM  
 K12.NC.US  
 BLINGCHEESE.COM  
 BRIGHT.COM  
 GOLF.COM  
 UPLOADING.COM  
 MEETME.COM  
 MOVIEWEB.COM  
 EVENUE.NET  
 SPRYLIVING.COM  
 TICKETLIQUIDATOR.COM  
 KRAFTBRANDS.COM  
 ULINE.COM  
 LG.COM  
 FREEBIECLUBS.COM  
 YAHOO.COM.PH  
 PHYS.ORG  
 CLIPARTOF.COM  
 MUSICNOTES.COM  
 CELEBJIHAD.COM  
 GAMESRADAR.COM  
 K12.OH.US  
 ROCKYOU.COM  
 GOGOANIME.COM  
 MYVOICENATION.COM  
 NBCNEWYORK.COM  
 TECHBARGAINS.COM  
 BEACHBODY.COM  
 BOSTONGLOBE.COM  
 FITSUGAR.COM  
 PINGER.COM  
 VUREEL.COM  
 WEBSHOTS.COM  
 IMGFAVE.COM  
 RODALE.COM  
 ODDEE.COM  
 COMICVINE.COM  
 VIBE.COM

## Website Application and Domain List

TAMU.EDU	WEBKINZ.COM
PCGAMER.COM	GAMERCLICK.COM
AMD.COM	MOVIESTARPLANET.COM
LEVI.COM	BARBIE.COM
UCLA.EDU	QUIBBLO.COM
ARCADEWEB.COM	GAMESXITE.COM
SUPERSAVINGSNOW.COM	PLAYHUB.COM
ABC7CHICAGO.COM	BASICSCAN.COM
HRW.COM	FOTOFLEXER.COM
8TRACKS.COM	HASBRO.COM
ONTHEREDCARPET.COM	CARTOWN.COM
WEBFETTI.COM	POKEMON.COM
TEENNICK.COM	MAXGAMES.COM
STUDYISLAND.COM	IMVU-CUSTOMER-SANDBOX.COM
NOTEBOOKREVIEW.COM	BOX10.COM
CLIFFSNOTES.COM	NEOPETS.COM
SUDDENLINK.NET	RHYMEZONE.COM
BATTLESHIPMOVIE.COM	PLANETMINECRAFT.COM
DEVRY.EDU	OURWORLD.COM
YOUBEAUTY.COM	MATTEL.COM
AQ.COM	POG.COM
DEGREELINK.NET	THESLAP.COM
NCH.COM.AU	NBAHOOPTROOP.COM
WETSEAL.COM	
COOLROM.COM	
DRJAYS.COM	
STICKPAGE.COM	
VEOH.COM	
MOTIFAKE.COM	
K12.IN.US	
VIDDLER.COM	
GOOGLE.ES	
ITIBITIPHONE.COM	
EDMOD.COM	
BUZZYA.COM	
SMILEBOX.COM	
GRADESAVER.COM	
TVDUCK.EU	
XEGEN.COM	
ADLSOFT.NET	
MONKEYQUEST.COM	
SUALIZE.US	
ANDKON.COM	
ANIMECRAZY.NET	
KABOOSE.COM	
KILLERHIPHOP.COM	
MOSHIMONSTERS.COM	
FORUMOTION.COM	
ACTSTUDENT.ORG	
BULBAGARDEN.NET	
CLIP.DJ	
PIZAP.COM	
QUIA.COM	
KABAM.COM	
K12.NJ.US	
ZUMIEZ.COM	
YEPI.COM	
FUNNY-GAMES.BIZ	
WE-CARE.COM	
HUMORSWITCH.COM	
FILEICE.NET	
WEEWORLD.COM	
GLOGSTER.COM	
CRUNCHYROLL.COM	
MOBILEPHONESURVEY.NET	
FANTAGE.COM	